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UNITED STATES DISTRICT COURT  
DISTRICT OF MAINE

U.S. DISTRICT COURT  
DISTRICT OF MAINE  
RECEIVED & FILED

2022 MAY 11 P 2:40

GREGORY B. SULLIVAN  
on behalf of himself and  
all those similarly situated,

Plaintiff,

vs.

CHESTER WATER AUTHORITY,  
JUDGE DOMINIC F. PILEGGI,  
EEOC-PHILADELPHIA OFFICE,  
(see attached)

Defendants,

bja  
DEPUTY CLERK

case no.

Jury trial requested

CLASS ACTION COMPLAINT

SHORT CAPTION:

SULLIVAN V. CHESTER WATER AUTHORITY, et al.



Defendants

CHESTER WATER AUTHORITY,  
JUDGE DOMINIC PILEGGI,  
EEOC-PHILADELPHIA OFFICE,  
ROBYN S. BENNETT,  
CROZER CHESTER MEDICAL CENTER,  
DR. EDWARD R. STANKIEWICZ, MD,  
PARK CARE OCCUPATIONAL HEALTH,  
HOSTEN AND ASSOCIATES OF MEDIA, PA,  
MARK ALAN RAITH,  
CITY OF CHESTER, PENNSYLVANIA,  
INTERNATIONAL BROTHERHOOD OF  
FIREMEN AND OTHERS SEIU  
LOCAL 473,  
HOSPITAL OF THE UNIVERSITY OF  
PENNSYLVANIA,  
DELAWARE COUNTY, PENNSYLVANIA,  
COMMONWEALTH OF PENNSYLVANIA,  
RACHEL DICKINSON, PA-C,  
DHHS-MAINE,  
PORTLAND STREET PUBLIC HEALTH  
CENTER,  
MERCY HOSPITAL,  
MERCY PRIMARY CARE,

(OVER)



PORTLAND INTERNAL MEDICINE,  
UNIVERSITY OF SOUTHERN MAINE -  
PORTLAND,  
RITE-AID,  
7-ELEVEN,  
OPPORTUNITY ALLIANCE,  
MATTHEW R. PROCTOR DIABETES  
CENTER,  
KRISTEN M. ELIENSOHN, APRN FNP,  
DR. KAREN OLSON, MD,  
HANNAFORDS SUPERMARKETS,  
GOVERNOR PAUL LE PAGE,  
BRENDAN JOHNSON,  
JUDGE VICTORIA EVANS,  
DR. JOSEPH R. ROLLAND, PAC,  
DR. JUSTIN B. BENNETT, MD,  
MAINE HEALTH MMP,  
ST. MARY'S,  
MARTIN'S POINT HEALTH CENTER,  
YMCA OF SOUTHERN MAINE -  
PORTLAND,  
DR. PETER J. AMEGLIO, MD,  
DR. JAMES A. KATZ, MD,  
EILEEN F. SKINNER,  
PREBLE STREET RESOURCE AND,

(over)



DAY CENTER,  
MERCY PRIMARY CARE,  
NEW ENGLAND FOOT AND ANKLE  
SPECIALISTS,  
GREATER PORTLAND TRANSIT DISTRICT,  
MAINE MEDICAL CENTER,  
PINE TREE LEGAL ASSISTANCE,  
PORTLAND POLICE DEPARTMENT,  
REGIONAL TRANSPORTATION PROGRAM,  
CITY OF PORTLAND, MAINE,  
GENERAL ASSISTANCE PROGRAM -  
PORTLAND,  
EDDIE BARAJAS,  
BIG APPLE,  
CVS,  
WALGREENS,  
WALGREENS,  
CLARION HOTEL,  
PORTLAND PUBLIC LIBRARY,  
MAINE BEHAVIORAL HEALTHCARE,  
SAVA LOT,  
WHOLE FOODS MARKET,  
CUMBERLAND FARMS,  
STATE OF MAINE,  
THE PHARMACY AT MAINE MEDICAL

(over)



CENTER,  
CUMBERLAND COUNTY, MAINE,  
MAINE ORTHOPAEDIC,  
PORTLAND FIRE DEPARTMENT,  
JUDITH A. SULLIVAN,  
PORTLAND HOUSING AUTHORITY,  
JOE'S SUPER VARIETY STORE,  
et al.



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## I Parties to This Complaint

### Plaintiff:

- 1 GREGORY B. SULLIVAN, Pro Se and all those similarly situated  
70 Forest Ave  
Portland, Cumberland County  
Maine, 04101  
(207) 450-3221

### Defendants:

- 1 CHESTER WATER AUTHORITY (CWA)  
Water utility, its managers, servants and/or employees  
415 Welsh St  
Chester, Delaware County  
Pennsylvania, 19013  
(610) 876-8181
- 2 JUDGE DOMINIC F. PILEGGI  
Judge, former Mayor, former PA State Senator  
804 20th St  
Chester, Delaware County  
Pennsylvania, 19013-5510  
delcocourts@co.delaware.pa.us

(over)



3. EEOC-PHILADELPHIA OFFICE

Government agency, its managers, caseworkers, servants and/or employees

801 Market St, Suite 1300

Philadelphia, Philadelphia County

Pennsylvania 19107-3126

Ph: 1 800 669 4000 / 267 589-9700

E-Mail: PDOContact@eeoc.gov

4. ROBYN S. BENNETT

CWA Assistant Human Resources Director

2005 W. 7th St

Chester, Delaware County

Pennsylvania, 19013

(610) 497-3438

5. CROZER CHESTER MEDICAL CENTER

Hospital, its physicians, servants and/or employees

1 Medical Center Blvd

Upland, Delaware County

Pennsylvania, 19013

(610) 447-2000 1 800 254-3258

6. DR. EDWARD R. STANKIEWICZ, MD

Physician's office, its physicians, servants, and/or employees

1579 Chichester Ave

over



Linwood, Delaware County  
Pennsylvania 19061  
Ph: (610) 485-5800

7. PARK CARE OCCUPATIONAL HEALTH

Hospital, its physicians, servants and/or employees  
1553 Chester Pike, Suite 204  
Crum Lynne, Delaware County  
Pennsylvania, 19022  
Ph: (610) 595-6811

8. HOLSTEN AND ASSOCIATES OF MEDIA, PA

Law office, lawyers, servants and/or employees  
1 S. OLIVE ST  
Media, Delaware County  
Pennsylvania 19063  
Ph: (610) 566-8800

9. MARK ALAN RAITH, ESQ.

Lawyer  
401 Brighton Ave  
Reading, Berks County  
Pennsylvania, 19606  
Ph: (610) 370-9466 (610) 627-2426

(over)



10. CITY OF CHESTER, PENNSYLVANIA

Municipality, mayors, servants and/or employees

City Hall

1 4th St

Chester, Delaware County

Pennsylvania, 19013

Ph: (610) 447-7700

11. INTERNATIONAL BROTHERHOOD OF FIREMEN AND  
OTHERS SETU LOCAL # 473

Labor Union, its leadership, members, servants and/or employees

3565 Sepriva St

Philadelphia, Philadelphia County

Pennsylvania, 19134

Ph: (215) 533-8440

12. HOSPITAL OF THE UNIVERSITY OF PENNSYLVANIA

Hospital, its physicians, servants and/or employees

3400 Spruce St

Philadelphia, Philadelphia County

Pennsylvania, 19104

Ph: (215) 662-4000

13. DELAWARE COUNTY, PENNSYLVANIA

County government, its council, servants and/or employees

(over)



201 W. Front St  
Media, Delaware County  
Pennsylvania, 19063  
Ph: (610) 891-4000  
E-mail: webmaster@co.delaware.pa.us

14. COMMONWEALTH OF PENNSYLVANIA

State government, its agencies, servants and/or employees  
Office of the Governor  
508 Main Capitol Building  
Harrisburg, Dauphin County  
Ph: (717) 787-2500

15. RACHEL DICKINSON, PA-C

Physician's Assistant  
1 Crescent Dr, Suite 100  
Philadelphia, Philadelphia County  
Pennsylvania, 19112  
Ph: (215) 952-9900

16. DHHS - MAINE

State government, its agencies, servants and/or employees  
109 Capitol St  
Augusta, Kennebec County  
Maine, 04330

(over)



Ph: (207) 287-3707

17. PORTLAND STREET PUBLIC HEALTH CENTER  
Clinic, its physicians, servants and/or employees  
20 Portland St  
Portland, Cumberland County  
Maine, 04101  
Ph: (207) 874-8445

18. MERCY HOSPITAL  
Hospital, its physicians, affiliates, servants and/or employees  
175 Fore River Parkway  
Portland, Cumberland County  
Maine, 04102  
Ph: (207) 879-3000

19. MERCY PRIMARY CARE  
Clinic, its providers, physicians, servants and/or employees  
175 Fore River Parkway  
Portland, Cumberland County  
Maine, 04101  
Ph: (207) 879-3000

20. PORTLAND INTERNAL MEDICINE  
Clinic, its providers, physicians, servants and/or employees  
(OVER)



43 Baxter Blvd  
Portland, Cumberland County  
Maine, 04101  
Ph: (207) 771-1717

21. UNIVERSITY OF SOUTHERN MAINE LIBRARY

Library, its staff, servant and/or employees  
314 Forest Ave  
Portland, Cumberland County  
Maine, 04101  
Ph: (207) 780-4270

22. RITE-AID

Pharmacy, its pharmacists, staff, servants and/or employees  
713 Congress St  
Portland, Cumberland County  
Maine, 04101  
Ph: (207) 774-8456

23. 7-ELEVEN

Convenience store, its servants and/or employees  
704 Congress St  
Portland, Cumberland County  
Maine, 04101  
Ph: (207) 871-1483

(over)



24. OPPORTUNITY ALLIANCE

Support program, its managers, servants, physicians and/or employees

190 Lancaster St, Suite 310

Portland, Cumberland County

Maine, 04101

Ph: (207) 874-1175

25. MATTINA R. PROCTOR DIABETES CENTER

Diabetes clinic, its physicians, servants and/or employees

144 State St

Portland, Cumberland County

Maine, 04101

Ph: (207) 400-8500

26. KRISTEN M. ELLENSOHN, APRN FNP

Diabetes physician

144 State St

Portland, Cumberland County

Maine, 04101

Ph: (207) 400-8500

27. DR. KAREN L. OLSON, MD

Physician

42 Flintlock St

Cumberland, Cumberland County

(over)



Maine, 04021

Ph: (207) 829-6011

28. HANNAFORD SUPERMARKET

Supermarket, its pharmacy, servants and/or employees

295 Forest Ave

Portland, Cumberland County

Maine, 04101

Ph: (207) 761-5965

29. GOVERNOR PAUL LE PAGE

Former Maine Governor

1 State House Station

Augusta, Kennebec County

Maine, 04333

Ph: (207) 287-3531

30. BRENDAN JOHNSON

Personal capacity, reached with the

506 Main St

Lewiston, Androscoggin County

Maine, 04240

Ph: (207) 782-2121

31. JUDGE VICKIE EVANS

(over)



Judge UDAR

One Portland Square Suite 600  
Portland, Cumberland County  
Maine, 04101

Ph: (877) 701-2137

32. DR. JOSEPH R. ROLLAND, PA-C

Personal capacity

175 Fore River Parkway  
Portland, Cumberland County  
Maine, 04101

Ph: (207) 879-3000

33. DR. JUSTIN B. BENNETT, MD

Personal Capacity

123 Medical Center Dr  
Brunswick, Cumberland  
Maine, 04011

Ph: (207) 373-6800

34. MAINE HEALTH MMP

Primary Care facility, its physicians, servants and/or employees

22 Bramhall St  
Portland, Cumberland County  
Maine, 04102

(over)



Ph: (207) 662-0111

35. ST. MARY'S HOSPITAL

Hospital, its physicians, servants and/or employees

15 Mollison Way

Lewiston, Androscoggin

Maine, 04240-5805

Ph: (207) 777-4440

36. MARTIN'S POINT HEALTH CARE

Health care facility, its physicians, servants and/or employees

331 Veranda St

Portland, Cumberland County

Maine, 04103-5544

Ph: (207) 828-2402

37. YMCA OF SOUTHERN MAINE - PORTLAND

Residential program, its directors, staff, residents and/or employee

217 High St

Portland, Cumberland County

Maine, 04101

Ph: (207) 874-1111

38. DR. PETER J. AMEGLIO, MD

Personal capacity

(over)



6839 Porto Fino Circle  
Fort Myers, Lee County  
Florida, 33912  
Ph: (239) 990-8138

39. DR. JAMES A. KATZ, MD  
Personal capacity  
43 Baxter Blvd  
Portland, Cumberland County  
Maine, 04101  
Ph: (207) 771-1717 (207) 879-3040

40. EILEEN F. SKINNER  
Personal capacity  
51 Blossom St  
Boston, Suffolk County  
Massachusetts, 02114  
Ph: (617) 722-3000

41. PREBLE STREET RESOURCE CENTER DAY SHELTER  
Resource center, its affiliates, servants and/or employees  
5 Portland St  
Portland, Cumberland County  
Maine, 04101  
Ph: (207) 775-0026

(over)



42. NEW ENGLAND FOOT AND ANKLE SPECIALISTS

Medical facility, its physicians, servants and/or employees

117 Auburn St

Portland, Cumberland County

Maine, 04103

Ph: (207) 797-4791

43. GREATER PORTLAND TRANSIT DISTRICT

Transportation Service, its servants and/or employees

114 Valley St

Portland, Cumberland County

Maine, 04102

Ph: (207) 774-0351

44. MAINE MEDICAL CENTER

Hospital, its affiliates, physicians, servants and/or employees

22 Bramhall St

Portland, Cumberland County

Maine, 04102

Ph: (207) 662-0111

45. PINE TREE LEGAL ASSISTANCE INC.

Legal aid facility, its lawyers, servants and/or employees

88 Federal St

Portland, Cumberland County

(over)



Maine, 04101

Ph: (207) 774-8211

46. PORTLAND POLICE DEPARTMENT

Police department, its officers, servants and/or employees

109 Middle St

Portland, Cumberland County

Maine, 04101

Ph: (207) 874-8479

47. REGIONAL TRANSPORTATION PROGRAM

Transportation service, its drivers, servants and/or employees

127 ST. JOHN ST

Portland, Cumberland County

Maine, 04102

Ph: (207) 774-2666

48. CITY OF PORTLAND, MAINE

City government, its departments, agencies, servants and/or employee

389 Congress St

Portland, Cumberland County

Maine, 04101

Ph: (207) 874-8300

49. GENERAL ASSISTANCE PROGRAM-PORTLAND

over

Assistance program, its financial eligibility specialists, and/or employees  
389 Congress St # 308  
Portland, Cumberland County  
Maine, 04101  
Ph: (207) 874-8633

50. EDDIE BARAJAS

personal capacity  
100 Waterman Dr., Suite 101  
South Portland, Cumberland County  
Maine, 04106  
Ph: (207) 773-4140

51. BIG APPLE

Convenience store, its servants and/or employees  
2 Park Ave  
Portland, Cumberland County  
Maine, 04101  
Ph: (207) 773-7909

52. CVS

Pharmacy, its servants, and/or employees  
510 Congress St  
Portland, Cumberland County  
Maine, 04101

(over)



Ph: (207) 773-7909

53. WALGREENS

Pharmacy, its servants and/or employees

290 Congress St

Portland, Cumberland County

Maine, 04101

Ph: (207) 774-0344

54. WALGREENS

Pharmacy, its servants and/or employees

127 Marginal Way

Portland, Cumberland County

Maine, 04101

Ph: (207) 771-5631

55. CLARION HOTEL

Hotel, its managers, servants and/or employees

1230 Congress St

Portland, Cumberland County

Maine, 04101

Ph: (207) 774-5611

56. PORTLAND PUBLIC LIBRARY

Library, its security guards, staff, servants, and/or employees  
(over)

5 Monument Square  
Portland, Cumberland County  
Maine, 04101  
Ph: (207) 871-1700

57. MAINE BEHAVIORAL HEALTHCARE

Counseling center, its counseling staff, servants and/or employees  
165 Lancaster St  
Portland, Cumberland County  
Maine, 04101  
Ph: (207) 874-1030

58. SAV A LOT

Supermarket, its servants and/or employees  
268 St John St  
Portland, Cumberland County  
Maine, 04101  
Ph: (207) 772-0622

59. WHOLE FOODS MARKET

Supermarket, its servants and/or employees  
2 Somerset St  
Portland, Cumberland County  
Maine, 04101  
Ph: (207) 774-7711

(over)



60. CUMBERLAND FARMS

Convenience store, its servants and/or employees

49 Pine St

Portland, Cumberland County

Maine, 04101

Ph: (207) 874-9528

61. STATE OF MAINE

State government, its departments, servants and/or employees

68 State House Station # 200

Augusta, Kennebec County

Maine, 04333

Ph: (207) 287-3531

62. THE PHARMACY AT MAINE MEDICAL CENTER

Pharmacy; its servants and/or employees

22 Bramhall St

Portland, Cumberland County

Maine, 04102

Ph: (207) 662-2626

63. CUMBERLAND COUNTY, MAINE

County government, its agencies, servants and/or employees

142 Federal St

Portland, Cumberland County

(over)

Maine, 04101

Ph: (207) 871-8380

64. MAINE ORTHOPAEDIC

Orthopaedic clinic, its physicians, and/or employees

1601 Congress St

Portland, Cumberland County

Maine, 04101

Ph: (207) 774-0342

65. PORTLAND FIRE DEPARTMENT

Fire department, EMS, servants and/or employees

380 Congress ST

Portland, Cumberland County

Maine, 04101

Ph: (207) 874-8400

66. JUDITH A. SULLIVAN

Personal Capacity, sister

1865 E Broadway Rd Apt 1005

Tempe, Maricopa County

Arizona, 85282

Ph: (623) 388-4891 (708) 535-9145

67. PORTLAND HOUSING AUTHORITY

-OVER-



Housing authority, its administrators, and/or employees  
14 Baxter Blvd  
Portland, Cumberland County  
Maine, 04101  
Ph: (207) 773-4753

68. JOE'S SUPER VARIETY STORE  
665 Congress St  
Portland, Cumberland County  
Maine, 04101  
Ph: (207) 773-3656

## IIA Jurisdiction and Venue

1. This action arises under the laws of the United States, in particular, the Racketeer Influenced and Corrupt Organizations Act ("RICO"), Civil RICO 18 U.S.C. § 1962 (c)(D); 18 U.S.C. § 1961 et seq.; 18 U.S.C. § 371; CRA Titles VI, VII and VIII; the Americans with Disabilities Act Titles I and II; 25 CFR § 11.406 (a) (3); 42 U.S.C. § 1981 and 42 U.S.C. § 1983. Accordingly, this Court has jurisdiction over the subject matter of this action pursuant to 28 U.S.C. § 1331; 18 U.S.C. § 1964; 18 U.S.C. § 1961 et seq.; and 42 U.S.C. §§ 2000e-5, 2000e-2, 2000e-3, and 2000e-16.

2. This Court has supplemental jurisdiction pursuant to Maine State Laws: Title 17-A § 905-C; Title 22 sec 4450: Chapter 13 concerning "Back Bills"; Title 17-A 353(1)(A); Title 17-A 355(1)(2) (A+B); 5 MRSA § 4582; and 14 MRSA § 753 as those claims are so closely related to the federal claims in this action that they form part of the same case or controversy.



## II B Diversity of Citizenship

### 1 The Plaintiff

a. The plaintiff, GREGORY B. SULLIVAN, is a citizen of the State of Maine.

### The Defendant(s)

a. The defendant, CHESTER WATER AUTHORITY, is incorporated under the laws of the State of Pennsylvania and has its principal place of business in the State of Pennsylvania.

b. The defendant, JUDGE DOMINIC F. PILEGGI, is a citizen of the State of Pennsylvania.

c. The defendant, ROBYN S. BENNETT, is a citizen of the State of Pennsylvania.

d. The defendant, CROZER CHESTER MEDICAL CENTER, is incorporated under the laws of the State of Pennsylvania, and has its principal place of business in the State of Pennsylvania.

- over -



e. The defendant, DR. EDWARD R. STANKIEWICZ, MD; is incorporated in the State of Pennsylvania and has its principal place of business in the State of Pennsylvania.

f. The defendant, PARK CARE OCCUPATIONAL HEALTH, is incorporated in the State of Pennsylvania, and has its principal place of business in the State of Pennsylvania.

g. The defendant, HOLSTEN AND ASSOCIATES OF MEDIA PA; is incorporated in the State of Pennsylvania, and has its principal place of business in the State of Pennsylvania.

h. The defendant, MARK ALAN RAITH, is a citizen of the State of Pennsylvania.

i. The defendant, CITY OF CHESTER, PENNSYLVANIA, is incorporated in the State of Pennsylvania, and has its principal place of business in the State of Pennsylvania.

j. The defendant, INTERNATIONAL BROTHERHOOD OF FIREMEN AND OTHERS SEIU LOCAL 473, is incorporated in the State of Pennsylvania and has



its principal place of business in the State of Pennsylvania.

k. The defendant, HOSPITAL OF THE UNIVERSITY OF PENNSYLVANIA, is incorporated in the State of Pennsylvania, and has its principal place of business in the State of Pennsylvania.

l. The defendant, DELAWARE COUNTY, PENNSYLVANIA, is incorporated in the State of Pennsylvania, and has its principal place of business in the State of Pennsylvania.

m. The defendant, COMMONWEALTH OF PENNSYLVANIA is incorporated in the State of Pennsylvania and has its principal place of business in the State of Pennsylvania.

n. The defendant, RACHEL DICKENSON, PA-C, is a citizen of the State of Pennsylvania.

o. The defendant, JUDITH ANN SULLIVAN, is a citizen of the State of Arizona.



C Venue is proper in this District pursuant to 18 U.S.C. § 1965 et seq., and 28 U.S.C. § 1391 et seq.; in that a substantial amount of the many defendants in this action either reside or do business in this District, and many of the events in this action occurred in this District. Though continuity of these actions span a time when Plaintiff lived in Pennsylvania until March of 2010; Plaintiff has resided in this District for well over ten (10) years.

Any change of venue to a different District for whatever reason, would cause such economic hardship, and physical and emotional distress to plaintiff that this case could not be litigated and would utterly negate the pursuit of justice.

III The amount of controversy in this action well exceeds the statutory sum of \$ 75,000.



1 PRAYER FOR RELIEF

2

3 I have gone through so much over the last  
4 23 years through the process described in this lawsuit.

5 I have lost:

6 a) my job;

7 b) my house;

8 c) my savings;

9 d) my health;

10 e) my relationships;

11 f) my inheritance from my mother's estate.

12 I am asking for the return to my job as I was  
13 unfairly terminated while on medical leave.

14 I am asking for all back pay to include: the average  
15 amount of overtime for my department; all cost of living  
16 adjustments and full benefits.

17 I am seeking the value of the property that I  
18 lost at 6727 Harley St Philadelphia Pa 19142.

19 The Inheritance left to me by my mother or the value  
20 thereof including: the houses at 100 E 24th St Chester Pa  
21 19013; 23 E. 18th St Chester Pa 19013; and 806 W. 11th ST  
22 Chester, Pa 19013.

23 I am also asking punitive damages for the pain and  
24 suffering, the medical maiming, the emotional strain and  
25 the continuing medical problems that I've incurred which

26 -over-



1 may last a long time.

2 I am also attempting to place a value on the one  
3 thing that I can't get back—the loss of twentythree  
4 years of which should have been the best in my life!  
5 I'm asking for \$20M dollors for every lost year for a total  
6 of \$460 million.

7

8

Thank You

9

God Bless

10

Gregory Brian Sullivan

11

Gregory Brian Sullivan

12

13 ✓ Certification and Closing

14

15

Date of signing March 17, 2022

16

17

Signature

Gregory Brian Sullivan

18

Printed

Gregory Brian Sullivan

19

20

21

22

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IV

1 (#1) I, plaintiff Gregory Brian Sullivan, am a sixty year  
2 old African-American male currently residing in Portland,  
3 Maine. In the year 2000, while living in Chester, Penn-  
4 sylvania, I filed a complaint with the Philadelphia of  
5 fice of the Equal Employment Opportunities Commisio  
6 (EEOC) against both my employer Chester Water Auth-  
7 ority (CWA); and my union, the International Broth-  
8 erhood of Firemen and Oilers Local 473 SIEU of Phila  
9 delphia, Pennsylvania; for racial harassment and discr  
10 imination.

11 The filing of that complaint started a bizarre  
12 chain of events taking place in two states, involving  
13 two separate criminal enterprises and lasting more  
14 than two decades; the consequences of which have cos  
15 me everything.

16  
17 (#2) In the spring of 1999 I applied for a job as a  
18 summer hire with Chester Water Authority and though  
19 I failed the hearing portion of the physical exam, I  
20 was hired anyway since it was only grass-cutting. At  
21 the end of the assignment I was considered for a full  
22 time position and sent back to Crozer-Chester Medical Cent  
23 Occupation Health for another physical. I again failed  
24 the hearing test.

25 Concerned about my prospects of being hired,  
26 — over —

1 I called the office of then-Chester Mayor Dominic Pileggi and was told "you'd better go back and pass that  
2 test!" I went back and tried several times but always  
3 failed. However, on December 22, 1999; just three days  
4 before Christmas, I was "passed"; but without the dist  
5 inction of being hearing impaired.  
6

7

8 (#3) On January 9, 2000 I began working for CWA and  
9 was assigned to a construction crew. The loud noise  
10 caused by heavy equipment, jack hammers and drills;  
11 created foreseeable problems and my hearing very quickly  
12 became an issue. Soon I was being taunted; the taunting  
13 then turned into harassment; the harassment then became  
14 racial. This then became toxic even though my foreman,  
15 Terry Nacrelli, was the shop steward for the union.

16 After speaking to my supervisor, the manager of  
17 the construction division and a human resources manager;  
18 I again called the office of then-Mayor Pileggi.  
19 For this I was suspended by CWA which prompted the  
20 aforementioned (#1, line 4) EEOC complaint filed in the  
21 year 2000.

22

23 (#4) Upon receiving my complaint the EEOC caseworker  
24 assigned to me, Elizabeth Wjasow, assured me that  
25 it would be an easy case. No problem. You don't need a

26

—over—



1 lawyer. She then issued two directives: first, drop the union  
2 from your complaint; the union can't be sued because  
3 you work for a municipality; and secondly, rewrite your  
4 complaint omitting Mr. Pileggi's name because that makes  
5 it political and politics are not allowed at the EEOC.

6 I would later find out that Dominic Pileggi had de-  
7 signed on running for State Senate; which he did and he  
8 won.

9

10 (#5) That initial complaint was settled through med-  
11 iation in 2001. In 2001 I was given a raise and sent to  
12 a new department as a meter serviceman; a promotion.  
13 I was elated, having been told at that time that I  
14 would have no problems from CWA because the EEOC  
15 does not tolerate retaliation. That was not the case.

16

17 (#6) In both 2003 and 2005 I again filed complaints  
18 against CWA with the EEOC for harassment and retaliation.  
19 Those complaints were handled by a different case-  
20 worker; Diana Schley. Ms. Schley at all times was combi-  
21 natively, indifferent, and always seemed to be advocating  
22 for CWA. Both cases were dismissed for no cause.

23

24 (#7) In 2007 things changed. On May 22, 2007 I was  
25 involved in a workplace accident in which I suffered

26

— over —



1 several different injuries. One of these was to my right  
2 great toe which was actually a reinjury of a problem that  
3 had occurred in 2003. I was not permitted access to  
4 proper medical care by the company or its occupational  
5 health care providers. CWA had a pattern of conspiring  
6 with health care providers in order to minimize the in-  
7 juries and illnesses of African-American employees  
8 while allowing white employees full benefits.

9 In July of 2007 I again filed a charge with the  
10 EEOC against CWA; this time for racial discrimination  
11 and retaliation. This charge was picked up by the EEOC  
12 and was also handled by Ms. Schley.

13 A few weeks after filing this charge I was threatene  
14 by a friend of my supervisor, Kim Koterbo, while on a  
15 service call. I felt extremely intimidated and soon dro  
16 ped the charge. Not long after, I was approached pri  
17 vately by Assistant Human Resources Manager (CWA)  
18 Robyn Bennett (African-American, female) and queried a  
19 to why I dropped the complaint. She explained to me  
20 that it was the third time in which an African-Amer-  
21 ican employee had filed for the same cause, and thu  
22 it would prompt an automatic investigation of the  
23 company. She added that she was telling me this be-  
24 cause she too was being discriminated against!

25

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— over —



1 (#8) In November of 2007 I refiled the charge from  
 2 July of 2007 (#7, line 9). This time, though the charge  
 3 was filed in November of 2007, Ms. Schley assigned a  
 4 2008 charge number to it (530-2008-00072) and then  
 5 stalled the case into March of that year, at which time  
 6 I was coerced into another mediation hearing with CWA,  
 7

8 (#9) By the time of the mediation hearing Dominic  
 9 Pileggi had not only won a State Senate seat (see #4, line 7)  
 10 but had become one of the most powerful politicians in  
 11 the state of Pennsylvania. Everyone who had legal expos-  
 12 ure in this complaint had a vested interest in preventing  
 13 an investigation; including State Senator Pileggi.

14 An investigation would have shown:  
 15 a) a conspiracy between CWA, its doctors and the union  
 16 b) Title VII violations;  
 17 c) violations of the Americans with Disabilities Act  
 18 d) insurance fraud; and  
 19 e) possible culpability in the premature death of  
 20 fellow claimant Woody Wise.

21 An investigation would have also shined a light on  
 22 one of the longest-running criminal enterprises in the  
 23 United States — the Delaware County Criminal Enterprise  
 24 the goal of which is to exploit the predominantly poor,  
 25 predominantly African-American city of Chester, Penn-  
 26

—over—



1 sylvania, for political and economic gain.

2

3 (#10) On March 18, 2008, as Barack Obama was giving his  
4 Speech on Race in Philadelphia, my mediation hearing took  
5 place just a few blocks away. In attendance were Robyn  
6 Bennett, Assistant Human Resources Manager (CWA); Solic-  
7 itor Francis J. Catania, sr. (CWA); the mediator, and myself.  
8 The meeting was contentious and, therefore, no conciliation  
9 was reached. I again had to reach out to the EEOC and  
10 Ms. Schley.

11

12 (#11) At the time of the mediation hearing I was out on  
13 medical leave unable to work. As previously stated the prob-  
14 lem with my right great toe began in 2003 (#7, line 3). At  
15 that time I saw Dr. David N. Bosacco M.D. at Riddle Me-  
16 morial Hospital. At the doctor's request images of my toe  
17 were taken and I was told nothing was wrong. I went  
18 back to work and continued on through moderate pain.  
19 This was the first in a pattern of physicians who refused  
20 to acknowledge the damage to my toe.

21 On May 22, 2007, the day of the workplace injury  
22 which was the basis for the EEOC complaint (#7, lines  
23 2,9); I went to the Crozer-Chester Medical Center where  
24 images were again taken of the same toe. The next two  
25 days, May 23rd and 24th, I saw Rachel Dickenson, Pa-C;

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1 of Crozer Keystone Center for Occupational Health; who  
2 while mocking me for my obvious limp, listed my injury  
3 on medical forms as left ~~toe~~ contusion on one day and  
4 right toe contusion on the next. My personal care physician  
5 Dr. Edward R. Stankiewicz M.D.; While refusing to ack-  
6 nowledge the injury to my toe on paper but knowing  
7 that I was in immense pain, chose to write me prescrip-  
8 tions for oxycodone but listed them in my records (with  
9 a wink and a nod) as being for lower back pain (which I  
10 do have).

11 The pain was so bad and the injury so severe that  
12 several times a day I had to remove my shoe and man-  
13 ually reset the bone in my toe!

14  
15 (#12) Also, from 1999 until the time the mediation hear-  
16 ing of March 18, 2008; I had continuously faced discrim-  
17 ination due to my hearing disability (#2, lines 5, 6); was  
18 marginalized and racially harassed because of it (#3, line  
19 12-14); and faced retaliation and harassment (#6, lines 17,  
20 18) resulting in my filing of subsequent EEOC complaint

21 The harassment that I faced during this time be-  
22 came intense to the point of being systematic. I woul  
23 later find that it was in the form of the COINTELPRO  
24 (counter intelligence program) which was first discov  
25 ered (not coincidentally) in the Delaware County bur

26

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1 ough of Media, Pennsylvania in 1971. This harassment,  
2 stalking and monitoring not only involved employees  
3 of CWA, but people in the community (#7, lines 13-15),  
4 and even family members.

5 Due to the high-profile names associated with  
6 my case; including: State Senator Dominic Pileggi (#  
7 lines 6-8); Terry Nacrelli, who was not only my Chief  
8 Shop Steward (#3, lines 13, 14) but also the son of former  
9 Chester Mayor John T. Nacrelli; and CWA supervisor Thom  
10 as A. Zetuskys (not mentioned heretofore), son of former  
11 President Judge Edward J. Zetuskys of Delaware County; an  
12 the entities involved; including: CWA; the City of Chester  
13 PA; the International Brotherhood of Firemen and Oilers  
14 Local 473 SIEU; Crozer Chester Medical Center; etc; I  
15 found myself under intense pressure. Though COIN-  
16 TELPRD was deemed illegal by the U.S. Senate in 1975,  
17 the tactics, evidently remained in use. Some of these  
18 tactics employed against me included: surveillance,  
19 stalking and harassing; monitoring of my phone and com-  
20 puter, monitoring of my social activities and my associa-  
21 tions; the theft, forging or altering of evidentiary doc-  
22 uments; witness tampering; threats and intimidat-  
23 ion, and gaslighting.

24

25 (#13) When the mediation ended with no conciliation

26

—over—

1 on March 18, 2008 (#10, lines 8-10) I began to call my  
2 caseworker Ms Schley. To add to the pain I was still  
3 experiencing from my injury, AND the mental anguish  
4 from the constant harassment; Ms Schley would not  
5 return my calls for months. I then contacted EEOC sup  
6 ervisor Joan Gmitter; both were noncommittal. I tried fo  
7 months to get them to enforce the powers of the 1964  
8 Civil Rights Act, they would not. It was frustrating.

9  
10 (#14) On October 9, 2008 I was terminated illegally whil  
11 on medical leave by CWA Assistant Human Resources  
12 Manager Robyn Bennett. After several months of monit  
13 oring my phone and computers they knew I could not  
14 find an attorney willing to go against all of those who  
15 had influence and exposure in the complaint. When I  
16 called the EEOC regarding my termination I was rebuffed  
17 by Ms. Schley who would not let me file a complaint agains  
18 CWA; instead, she told me to call my union. Upon calling  
19 the union I was told by the president Ron Kirschner tha  
20 he could not help. The company's insurance agent, Holst  
21 en and Associates of Media, PA also would not contact  
22 me concerning a settlement. I finally heard from the  
23 agent, Mark Alan Raith, in February of 2009. By that  
24 time I was under a great deal of stress; out of finar  
25 cial resources; and still had an unresolved issue wit

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1 my toe injury. I was unable to settle at the time Mr.  
2 Raith contacted me.

3

4 (#15) Shortly after my termination I went to the off  
5 ice of the U.S. Attorney for the Eastern District of Penn-  
6 sylvania, who at that time (November of 2008) was Pat  
7 rick Meehan - former District Attorney for Delaware  
8 County. There I reported the insurance fraud that my  
9 EEOC complaint was largely based on. Of course, that  
10 went nowhere.

11

12 (#16) After being terminated I was trying desperately  
13 hold on to my house in Southwest Philadelphia. However  
14 in March of 2010, still injured and seeking medical att  
15 ention, I decided to leave the state in order to get awa  
16 from the corruption and influence of the people in  
17 Delaware County. I chose Maine fully intending to get  
18 treatment for my injury and then; once fully strength-  
19 ened; return to Pennsylvania seeking adjudication of  
20 my case and proper restitution.

21

22 (#17) I arrived in Portland, Maine on March 10, 2010. Th  
23 next day I was directed to the General Assistance  
24 (GA) office to apply for benefits. There a caseworker  
25 "Carol" told me "you people come here and use up all

26

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1 of our resources". In my first full week in the state  
2 (March 11<sup>th</sup> - 18<sup>th</sup>) I was subjected to two discriminatory  
3 incidents (the other by Senior Human Resources Coordin  
4 ator Aaron Guyer who, when I told him of several Fort  
5 une 500 companies I wanted to apply to, replied "You  
6 might as well forget that"); and was also denied med  
7 ical care at three separate facilities: Portland Street  
8 Public Health Center; Mercy Hospital Emergency Depart  
9 ment; and Mercy Primary Care.

10 At the third, Mercy Primary Care, the physician  
11 Noel Genova PAC uttered the same distasteful remark  
12 as the GA caseworker (word for word). She then went on  
13 to make references to incidents which occurred in Penn  
14 sylvania; both at CWA and its health care provider Par  
15 Care Occupational Health Center; this though I was a  
16 new patient and had given her no prior information nor  
17 the consent to obtain any. All of this was said through  
18 a bevy of slurs and ultimately let me know there was  
19 cooperation not only from state-to-state but also from  
20 one city venue to another. I would soon realize that I  
21 had entered into a whole new criminal enterprise.

22  
23 (#18) On March 14<sup>th</sup>, 2010 I had moved into the YMCA  
24 of Portland with a rent voucher from GA. At that time;  
25 of the approximately 40 residents only three were

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1 Black, one on each floor. I was told shortly after  
2 moving in that one particular resident was "allowed"  
3 to call me 'nigger'.

4 On March 20<sup>th</sup> (only ten days in the state) I found  
5 a job at the Clarion Hotel, though still suffering from  
6 my injury and still very much in pain. However, though  
7 I quickly found employment, got off of public assist-  
8 ance; and began making self-insured payments to  
9 Mercy hospital, the problems persisted.

10 What at first seemed like an unspoken policy of  
11 racial discrimination and harassment would later be  
12 given a clear voice by Governor Paul LePage when,  
13 during a 2016 press conference, he suggested that  
14 minorities were coming to Maine to "sell drugs and  
15 impregnate white girls."

16  
17 (#19) On March 24, 2010, still in need of medical attent  
18 ion, I wrote a letter of complaint to Mercy Hospital to  
19 let them know that two of their facilities had denied m  
20 medical attention; the Emergency Department, and Merc  
21 Primary Care (#17, lines 8, 9). That letter was received by  
22 Eileen Skinner CEO of Mercy Hospital who informed me  
23 that she had just been promoted from Patient Advocacy  
24 there was no one there to receive my complaint, but sh  
25 would help.

26

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1 By April 14, 2010 I was given Mercy Free Care (thou  
2 I was already paying out of pocket) (#18, lines 8,9) and  
3 after having images taken of my toe, was sent by Ms  
4 Skinner back to Mercy Primary Care under the care of  
5 Dr. James Katz who would be my primary care physic  
6 ian. I was assured that I would be getting an oper  
7 ation on my right great toe at no cost through New  
8 England Foot and Ankle and Dr. Peter Ameglio.

9  
10 (#20) On April 9, 2010 I received my first paycheck  
11 from the Clarion Hotel. I noticed immediately that m  
12 agreed upon hourly wage had been lowered by one  
13 dollar. On the day that I applied I was hired on-the  
14 spot and began working that very day, now they knew  
15 who I was. This was another indication that my nar  
16 and situation was being disseminated everywhere (#  
17 lines 19,20). After a contentious debate with manage  
18 ment my hourly wage was restored but I was cheate  
19 out of my proper tips!

20 Soon the discriminatory behavior became mo  
21 overt: a two-man job setting up banquets became m  
22 working alone. Later, everyone working at the front  
23 of the hotel became my boss. The cooks refused to  
24 make me meals and the waitstaff refused to take m  
25 order; I sometimes had to leave the hotel to buy food

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1 I couldn't quit because I would be ineligible to re-  
2 ceive benefits. Eventually I asked if I could take a  
3 paycut and move to housekeeping; they said yes. All of  
4 the workers in the front of the hotel were white; all but  
5 two in housekeeping were of African descent: from Su-  
6 dan or Somalia.

7  
8 (#21) In May of 2010 I went to New England Foot and  
9 Ankle. There I met Dr. Peter Ameglio, MD who took  
10 images of my foot, explained the necessary procedure  
11 for my operation, and set up a plan for my aftercare.  
12 then sent me to his scheduling assistant. When she  
13 found out that I lived at the YMCA she told me, "it  
14 too nasty there, come back when you find a better  
15 place to live".

16 That prompted a second letter of complaint,  
17 also received by Mercy Hospital CEO Eileen Skinner (see  
18 #19, lines 21, 22); who again told me that the new Pa-  
19 tient Advocate Melissa Skahan had just been promoted  
20 so again I could not file a formal complaint. She once  
21 again promised to help and on July 8, 2010 I finally  
22 had my operation.

23  
24 (#22) Within a few weeks of the operation I knew  
25 something was wrong. I expected some pain but

26

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1 what I was feeling was unimaginable. The swelling  
2 was not just confined to my toe (which was operated  
3 on) or my foot; but went all the way up my right leg.  
4 By mid-August I knew that I had been intentionally,  
5 feloniously medically maimed; especially after all of the dis-  
6 crimination that had taken place, and my willing-  
7 ness to report it.

8 I began asking Mercy Primary Care for a referral  
9 al to see another doctor but their referral specialist  
10 kept putting me off. This went on for weeks. By the  
11 end of September 2010 I decided if I did not get a  
12 referral by October 1<sup>st</sup>, I would seek help on my own.  
13

14 (#23) On October 1, 2010 I went to Maine Medical  
15 Center (MMC) and entered the Emergency Department  
16 where I showed the physicians the site of my sur-  
17 gery and the effects on my foot and leg. On that  
18 day (which may have gone into October 2<sup>nd</sup>) they took  
19 images of my toe and foot. I never heard anything.  
20 On October 19<sup>th</sup> I returned to the Emergency Depart-  
21 ment, this time in extreme pain and seeking some-  
22 thing for relief.

23 While in the exam room, feeling upset and  
24 frustrated, I intimated that I might sue the doctor  
25 who performed the operation. The attending physic-  
26

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1     ian then left and a different doctor came in. This doc  
2     tor began loudly berating me and accused me of chas  
3     ing pain medication; all but calling me a junkie. Whe  
4     I asked to see the images the hospital had taken c  
5     my prior visit (#23, lines 18, 19), he obliged. Every time h  
6     pushed the button to change an image he yelled "yo  
7     got nothing!"; he did this eight times. On the ninth  
8     view the image turned sideways and showed a screw  
9     going through my bone, into my soft tissue. We both  
10    looked at each other shocked. He apologetically said  
11    "that looks painful"; he then left the room and came  
12    back with some pain medication to take then, and a  
13    prescription to get some later. The name on the presc  
14    ription was Justin Bennett.

15  
16    (#24) On November 1, 2010, less than two weeks afte  
17    the Maine Medical Center (MMC) incident, I found my-  
18    self back at Mercy Primary Care for an appointment. Ir  
19    itally I was to be seen for flu-like symptoms but ha  
20    recovered; however, I decided to show up so as not to  
21    be listed as a no-show. When I was assigned to Noel  
22    Genova PAC, the person who had greeted me with slurs  
23    on my first visit (#17, lines 10-18), I refused to see her  
24    I was then sent to an exam room where a physician's  
25    assistant asked about my visit. I told her that I was

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1 in need of pain medications; she then left and returned  
2 telling me that the next available doctor was "not  
3 certified" to dispense pain meds (this was the same  
4 line I heard at Portland Street Public Health Center,  
5 #7, lines 7,8). I was told to come back in a couple of  
6 days to see Dr. Katz. As I left everyone was laughin

7 On the way out of the hospital I was in so  
8 much pain I decided to go to the Emergency Depart  
9 ment. When the triage nurse saw that I was just  
10 seen upstairs for pain meds, she thought that I was  
11 involved in wrongdoing. She called in a male doctor  
12 who confronted me. When I explained what had jus  
13 happened he said, "wait here". When he returned he  
14 he told me to go upstairs and get my prescription. t  
15 seemed angry: not with me, with them. I assumed  
16 he would file a report - I did not; I knew by this  
17 time it would go nowhere. The next day, November:  
18 2010 I received an accusatory letter placing the blan  
19 on me.

20

21 (#25) On November 5, 2010 I called Mercy Primary Care  
22 about the pain medication that they had given me; i  
23 was not working for the level of pain I was in. Helen  
24 the physician's assistant, began berating me and hun  
25 up. I was at my wits end; I called the suicide Hot -

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1 line. The call was dropped. I called again; that call was  
2 dropped. On the third try I asked "why won't you help  
3 me?" The person on the other end addressed me by  
4 name — it was Michelle from Mercy Primary Care. She  
5 told me "Don't do anything!", come in on Monday (it  
6 was Friday) and see Dr. Katz. I didn't understand how  
7 my call was reverted to the doctor's office but she  
8 seemed concerned so I did what she said.

9 On Monday November 8, 2010, Dr. Katz wrote me  
10 a prescription for 120 oxycodone pills (15mg) in add  
11 ition to the 112 oxycodone pills (7.5mg) written just  
12 7 days prior; this without even asking to see my foot.  
13 This portends that; though no mention was made of  
14 it, he knew about the screw going through my bone in  
15 to my soft tissue.

16 Though I called the suicide hotline on Novem-  
17 ber 5, 2010 no one directed me toward help. Obviously,  
18 the "concern" that I thought Michelle had was for  
19 her office and the actions of the staff. After filling the  
20 second prescription I was embarrassed about being la-  
21 beled a "junkie" so I took the 100 or so 7.5mg. pills to Dr.  
22 Katz and gave them to him (he accepted them).

23

24 (#26) Following the disturbing incidents at MMC  
25 in October of 2010; and at Mercy Primary Care in Nov-

26

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ember of 2010: all semblance of proper medical care, as  
pertains to myself, ceased. At the end of November I  
was finally given a referral (see #22, lines 8-10) to see  
Dr. Reed Gramse MD of Maine Orthopedics (11/25/2010) wh  
loudly and angrily told that he saw my images and tha  
nothing was wrong with my toe. The appointment  
lasted less than three minutes. I was later sent to  
Maine Orthotic and Prosthetic Rehab Services, Inc. wher  
I was given a boot to wear. Every physician that I've  
gone to following the surgery on my right great toe on  
July 8, 2010; has either known about, or should have  
been aware of the issue with this surgery and the con  
plications that arose from it. The physicians include:  
New England Foot and Ankle; Mercy Primary Care; Port  
land Internal Medicine, Dr. James Katz, MD; MMC Eme  
gency Department; Mercy Hospital Emergency Depart-  
ment; Dr. Justin Bennett, MD; Maine Orthopedics; Dr. Re  
Gramse MD; Maine Orthotic and Prosthetic Rehab Serv-  
ices Inc.; The Hospital of the University of Pennsylvania  
(where I went during a visit home in 2011); Opportunit  
Alliance and Dr. Karen Olson MD; the Mattina R. Proctor  
Diabetes Center at Northern Light; and Martins Point  
Health Center; and Joseph R. Rolland, PAC.

The failure to properly treat my toe following th  
medical maiming and the cover-up thereof; has cause

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- 1 not just chronic foot pain but complications such as:
- 2 huge weight gain; chronic high blood pressure, type II
- 3 diabetes, stress, anxiety, inactivity and, of course the use
- 4 of pain medications for a prolonged period of time.

5 Though I went to Mercy Primary Care (and then for  
6 hand Internal Medicine) for over 7 years, Dr. Katz never  
7 at any time asked to look at my foot!

9 (#27) Following the operation on July 8, 2010 I had to  
10 again seek assistance (see #17, lines 23, 24). My initial ex-  
11 posure to this system was so brief (just one week) that  
12 I did not get an accurate view of how it operated, ~~no~~  
13 I would.

14 First, I noticed that there were very few Black  
15 people employed anywhere I went; if any at all. These  
16 places included: General Assistance; the Social Security  
17 Office; Department of Health and Human Services; City  
18 Hall; Police, Fire and EMT services; The Preble Street Soup  
19 Kitchen; the food and clothing pantries; the local Pharmacies;  
20 the two major hospitals; counseling and social services facilities;  
21 Hannaford's Supermarket and the Metro Bus Service.

23 Secondly, there were long lines everywhere.  
24 Anything that a needy person sought - there was a  
25 long line for. This included: General Assistance, Social

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1 Security; Department of Health and Human Services (then  
 2 on Marginal Way); The Preble Street Soup Kitchen; the food  
 3 and clothing pantries; and the Greater Portland Transit  
 4 District Bus Garage (for bus passes),

5 Thirdly, these lines, which often began forming at  
 6 or near midnight, were used to harass and intimidate  
 7 those in need of services: if you complained or reported  
 8 discrimination or abuse, your name would be dissemin-  
 9 ated and you would be harassed everywhere!

10 I soon found that the City of Portland regularly and  
 11 systematically discriminates against minorities, the  
 12 homeless and those without the financial means or  
 13 the legal prowess to fight back. I've personally exper-  
 14 ienced discrimination at every state, federal, and local  
 15 level of government; every medical facility; business  
 16 social service; and mode of transportation that I've  
 17 patronized since moving to Maine in March of 2010.

18 As a result I've been denied: proper medical care  
 19 dental care; access to public transportation and medi-  
 20 cal transport; safe housing; Social Security and dis-  
 21 ability benefits (at both the state and federal level),  
 22 access to communications (both telephone and computer),  
 23 the 911 system; EMT services; counseling and social service;  
 24 police protection and most importantly legal aid and the  
 25 fair and equal access to the justice system (e.g., the right

26

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1 to file complaints and police reports).

2

3 (#28) Upon returning to General Assistance in July of 20  
4 following my surgery, I noticed three things: first there  
5 were very long lines which began forming around midnight  
6 (#27, lines 5, 6). When I first arrived on March 11, 2010, I wa  
7 ushered in as a new recipient; this was shocking.

8 Secondly, of the one hundred or so people in line  
9 was often the only Black person. As such, I was frequen  
10 ly subjected to harassment. If other Black people were  
11 receiving benefits at that time I don't know where  
12 they went.

13 Thirdly, recipients were made to show up every  
14 week (for what I would later find out were monthly  
15 benefits) in order to apply for rent, food and non-food vo  
16 chers. Recipients were told if they missed a week their  
17 benefits would be forfeited because "GA does not pay  
18 back bills". That, I would find out much later, was not tru  
19 In fact, Section 13-2 Definitions of the General Assist-  
20 ance program states: "Back bills are any charges and  
21 services received prior to application. A bill that is du  
22 in the same month in which an application is made is  
23 not a back bill."

24 After months of standing in long lines in which  
25 I was often harassed by other recipients and security

26

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1 guards, and then faced discrimination and bullying by  
2 caseworkers; I finally went to City Hall in July of 2011  
3 It would be the first of three visits in which I spoke  
4 to three different Department of Health and Human  
5 Services Directors who oversaw the administrations  
6 of three different General Assistance Directors. On  
7 that visit I spoke with Doug Gardner.

8 During that visit I discussed the problems that I  
9 was having at the General Assistance program which  
10 was then being directed by Palmer Peters. I spoke of  
11 the harassment, abuse and denial of services by case  
12 worker Tammy Morse. I also mentioned the long lines  
13 and questioned the wisdom of having people line up  
14 in the middle of the night to receive benefits; asking  
15 "what if a woman is raped coming out at midnight?"

16 Following that meeting Tammy Morse was no longer  
17 my caseworker but not much changed to the General  
18 Assistance program. However, I began being harassed  
19 everywhere. This included: the YMCA (my only residence  
20 since March 14, 2010 until the writing of this  
21 document); Portland Internal Medicine, the DHHS  
22 office; the pharmacies; Hannaford's Supermarket;  
23 Paul's Food Center; the Preble Street Soup Kitchen (where  
24 I had to eat due to inadequate distribution of my  
25 food vouchers); the Metro Bus Terminal; and of course

26

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1 the General Assistance Program itself (the list was not  
2 all inclusive).

3 I was harassed, stalked, verbally abused and  
4 often was subjected to people trying to provoke me to  
5 violence.

6  
7 (#29) By October of 2012 I was still unable to work  
8 due to ongoing complications from my operation (#21, list  
9 21, 22), and very much in need of things such as clothing and  
10 footwear, etc. When I asked my caseworker "Alex" (female)  
11 I was rebuffed. I asked for a copy of the General  
12 Assistance guidelines and she told me "no, go to the  
13 library." Following that encounter, however, things began  
14 to change. Soon clients were allowed to apply for benefits  
15 fits every two weeks, and then eventually once a month.  
16 I finally found out that my monthly food voucher  
17 allotment was one hundred and eighty dollars as opposed  
18 to the twenty dollars that I was given. Also I was  
19 allowed forty-five dollars for non-food as opposed to  
20 just ten.

21 This was disturbing but I said nothing. Within  
22 just a few months; during February of 2013, I was sus-  
23 pended from the General Assistance program for inex-  
24 plicable reasons. This was done, I believe, to force me to  
25 leave the state of Maine. I did not.

26

— Over —

1 (#30) I returned to the General Assistance program in Jun  
2 of 2013 after being suspended for 120 days (during which  
3 time my 81 year old father paid my rent); to find that Palmer  
4 Peters (#28, lines 9,10) was gone along with several of the  
5 caseworkers. Tammy Morse and "Alex" (#29, line 10,11) stayed.

6 The harassment continued for months but I dealt  
7 with it the best I could. I was told that on December 3  
8 2013 I would no longer receive MaineCare or Foodstamps  
9 although my physician, Dr. James Katz MD, continuously  
10 provided medical forms stating that I could not work.  
11 Indeed, at the start of 2014 I had no benefits and had  
12 to rely solely on General Assistance. I once again felt  
13 these things were done in order to get me to leave the  
14 state.

15 By September of 2014, determined not to go  
16 through another year of harassment and abuse, I again  
17 asked for a copy of the General Assistance guidelines  
18 along with a copy of my file. The General Assistance  
19 director Robert Duranleau who had replaced Palmer Pe  
20 ters resigned!

21 I was stalled, maligned and put off for several  
22 months; when I called City Hall I found Doug Gardner  
23 (#28, lines 3-7) was gone and replaced by Dawn Stiles c  
24 Department of Health and Human Services Director. By  
25 the beginning of 2015 I finally receive what I asked for

26

— Over —



1 (#31) Tired of the harassment and abuse I was experienc  
2 ing everywhere I went, on January 6, 2015, I went to the  
3 Portland Police Department to file a complaint against Bill  
4 Bormet the director of the residential side of the YMCA  
5 of Portland, Maine (further explanation in later paragraph)  
6 I was met by two officers Pavlis and Grass who took me  
7 into an interview room. I detailed the harassment and the  
8 places involved, but, as soon as I mentioned General Assis  
9 stance they got up and bolted from the room. It was  
10 odd behavior, and when they returned they refused to  
11 give me a copy of the police report.

12 The next day Bill Bormet the YMCA director was  
13 gone!

14  
15 (#32) By February of 2015 I had read the City Ordin  
16 ances concerning General Assistance. When I read the  
17 part about Back Bills (#28, lines 19-23) I understood why  
18 the caseworkers wanted me out of the program. There was  
19 never any reason to stand in line every week and any-  
20 one who had their benefits forfeited, had them stolen.

21 Up to that point, due to the racial slurs and an-  
22 imus I felt that the problems only involved myself; now  
23 I knew it was much larger.

24 In February of 2015 I reported the theft of ben-  
25 efits to Dawn Stiles Director of DHHS in City Hall. She

26 —Over—

1 told me that she would investigate.

2 By May of 2015 she had instructed "Jon" a casework  
3 er at GA to lower my food vouchers by fifty-eight dol  
4 ars SAYING that I lived at the YMCA so my rent was  
5 to be paid for four weeks instead of monthly (???).

6

7 (#33) By 2016 I knew that there was a concerted eff  
8 ort to keep me from reporting when the Portland Polic  
9 refused to allow me to file charges, though I had receiv  
10 ed a copy of my personal GA file the year 2010 (with th  
11 most theft of benefits) was missing; I had been summar  
12 ily dismissed by two Directors of DFHS; and on several oc  
13 asions Pine Tree Legal had refused me service.

14 In December of 2016 with GA caseworkers still  
15 attempting to push me out of the program, I went to  
16 the Portland Public Library to seek information on how  
17 to do things on my own. The head of security at the lib  
18 rary was a former security guard at GA. On December 1  
19 2016 I ordered a book entitled How To Represent Your  
20 self In Court. On my next visit to GA I was paired wit  
21 Tammy Morse.

22 Immediately in anticipation of a legal problem  
23 Tammy and others began trying to gain access to my  
24 personal information by sending me to Med Access to  
25 get medications I had been getting for years from GA

26

— OVER —



1 By 5/17/17 I was told I was being suspended  
2 from GA for 120 days for not signing papers that would  
3 give them access to my personal information. At that  
4 time David MacClean had replaced Robert Duranleau  
5 as the Director of General Assistance. In my Request For  
6 A Fair Hearing I reminded Mr. MacClean that coercion  
7 and extortion were crimes. I was allowed to remain.

8 The thought of being made homeless was extreme  
9 stressful and caused me to temporarily halt my pursuit  
10 of justice. The stress was debilitating.

11  
12 (#34) In June of 2017, following the "Fair Hearing", I  
13 was made to send in an application for MaineCare Dis-  
14 ability which was sealed and mailed-in in front of Mr.  
15 MacClean, in which no personal information that I did  
16 not want disclosed was entered. After that I no longer  
17 heard from him and he was replaced by Ryan Gornea  
18 the new GA Director.

19 The harassment went on as I was continuously  
20 made to take Workfare paperwork to my physician  
21 in order to "prove" that I was disabled although  
22 Dr. James Katz MD had made that designation  
23 years earlier. When I complained I was told that  
24 "permanently disabled" doesn't actually mean that  
25 it's permanent(?).  
26

—over—

1 (#35) By 2019 I again, being fed up, went to City  
2 Hall. Now Dawn Stiles was no longer Director of DHHS  
3 but was replaced by Kristen Dow. I again reported the  
4 theft of benefits and Ms. Dow said she would look into  
5 it. In September of 2019 she told me that I would again  
6 have to apply for Social Security (though I had done so  
7 previously). She gave me an address to go to, 231 Fore  
8 Street in Portland; which I thought was odd. I called  
9 the information hotline and was directed to 550 Fores  
10 Avenue — but go to the side door (also odd). When I was  
11 there was a sign posted saying that they had relocated  
12 to the Fore Street address. I took a picture of this  
13 posting with my cell phone.

14 The site was bogus and fraudulent but I was  
15 sent by a government official. I had no where to turn  
16 and they knew I took the picture. That phone would  
17 later wind up disabled and through a good deal of  
18 the pandemic I had no service, and later no phone.

19 From the time I returned to GA after my surgery  
20 (#28, lines 3, 4) until the writing of this document  
21 I have been made to run back and forth to the doctor's  
22 office to provide proof of disability on ever-changing  
23 paperwork. Caseworkers were deliberately trying to harass  
24 me to leave the state or go to work in order to absolve  
25 the doctors of responsibility and to hide their theft  
26

—Over—



1 The stress of having to deal with the caseworkers while  
2 also dealing with the abuse was overwhelming. It con  
3 inues to this day.

4

5 (#36) As previously stated (#31, lines 2, 3) on January 6  
6 2015 I went to the Portland Police Department to file  
7 charges against Bill Bormet director of the residential  
8 program of the YMCA of Portland, Maine; for theft, ex-  
9 tortion and harassment. After a forty-five minute wa  
10 in the lobby, two uniformed officers, Paulis and Grass  
11 came in the front door and took me to an interview  
12 room. There I detailed how I was being extorted for  
13 pain medications and having to constantly deal with  
14 thefts of those medications and belongings. I then spok  
15 of the harassment, which had began in Pennsylvania,  
16 continued through my operation and now I was havin  
17 to deal with it everywhere. When I mentioned Genera  
18 Assistance they bolted from the room.

19 Upon returning to the room they then asked for  
20 my I.D. which they then took, presumably to copy it  
21 or run for prior arrests. When they came back I was  
22 told, "We can't say anything to Bill Bormet because  
23 he still has to take care of you". I took that as a  
24 veiled threat. When I asked for a copy of the police  
25 report I was told they don't give out police reports.

26

— Over —

1 I was then ushered out.

2 ' Later that evening, feeling disgusted that I had  
3 finally taken that step but accomplished nothing, I  
4 called the non-emergency number to speak with some  
5 one about what took place. When I described the in-  
6 cident to the operator she told me it couldn't have  
7 been Officer Pavlis because he was on leave! I told her  
8 they had given me a business card with both their names  
9 and she knew something was wrong; she gave me a  
10 different number and let me know she did not want  
11 to be involved.

12 After speaking with that operator I remember  
13 ed that as I was leaving the police station there was  
14 a shift change. Officers were greeting officer Pavlis  
15 as if they had not seen him in a while. I then be-  
16 came aware that he came in just to take my state-  
17 ment and then he could claim he wasn't there. This  
18 seemed similar to the incidents with Eileen Skinner  
19 at Mercy Hospital (#19, lines 21, 22), (#21, lines 17, 18) in  
20 which I was not able to file a complaint.

21  
22 (#37) The incident at the Portland Police Depart-  
23 ment in January of 2015 was not the first. In April of  
24 2010, just weeks after my arrival on March 10th, I  
25 was approached by a bicycle officer at a park on the

26

—Over—



1 corner of Congress and High Streets and asked for my  
2 I.D. When I asked why, I was told that I was acting  
3 suspiciously. "Most people sit facing that way"; I was  
4 facing a wall! After running my name (it came back with  
5 no warrants) I was told next time I don't comply right  
6 away "you're going to be thrown against that wall".

7 I realized later that this was after the letter  
8 (at least the first one) to Eileen Skinner at Mercy Hospital  
9

10 (#38) In the summer of 2011, while shopping at the  
11 Hannafords Supermarket, I approached a female cash  
12 ier with whom I had regular "polite" conversations.  
13 On this day she was at the customer service counter:  
14 when I asked for a bus validation she leaned on the  
15 counter and began acting seductively and speaking in  
16 a provocative manner. We did not speak to each other  
17 that way. I immediately began looking for cameras  
18 when I looked straight at the two-way mirror I saw  
19 a Portland Police officer. Feeling that I may be able  
20 to see him; he ducked to one side: when my eyes fol  
21 owed he quickly ran from the room as if he was doi  
22 wrong!

23 I never again had conversations of any kind  
24 with that employee.

25

26

— Over —

1 (#39) On July 4, 2012 around midnight, I  
2 stopped at the Big Apple store on Park Avenue in  
3 Portland where an employee allowed me to use the  
4 phone to call 911 for a ride to the hospital. When the  
5 EMT personnel arrived they refused to transport me.  
6 I called a second time; this time the operator asked if I  
7 would like an officer to respond; I said "yes". When the  
8 officer responded (a corporal) he seemed angry asking  
9 me, "do you want me to get out of this car"? Then the  
10 EMT's showed up. I was surrounded as if I was going  
11 to be jumped. The officer, speaking as if I wasn't even  
12 there, told them that the shelter down the street was  
13 closed and I was looking for a place to lay up (I had  
14 a backpack with Bible and meds). I told them that I  
15 was not homeless, that I lived right up the street and  
16 they all grew concerned knowing that he had spoken out  
17 of turn. Instead of making it right and giving me a  
18 ride, he told them if I made it this far I could walk  
19 to the hospital — which I did.

20 The whole incident was stressful, scary and humili-  
21 ating. It also led to several other incidents including  
22 later that night at Maine Medical Center where I walked  
23 seeking medical service; being threatened by the manager  
24 of the Big Apple after she voluntarily showed me videos  
25 of the two interactions with the EMT services, and;

26

— Over —



1 after contact the Director of the Fire/EMT services  
2 concerning those incidents, someone entered my room  
3 and tore up everything I had written about the Matt  
4

5 (#40) Concerning my residence at the YMCA of Portland  
6 ME: I arrived in Portland on March 10, 2010 as previously  
7 stated (#17, line 22). Seeking a place to stay, I was directed  
8 to the YMCA by a taxi driver. There I talked to Bill Borme  
9 the residential director whose main concern was how I was  
10 going to pay my rent; and though I told him "cash", I  
11 moved in on March 14, 2010 with a rent voucher from the  
12 General Assistance program. Not long after moving in the  
13 problems began. I would soon find myself being racially  
14 ly harassed; extorted for the legally prescribed prescription  
15 medications I possessed; subjected to a system  
16 of community stalking and having to deal with bug and  
17 insect infestations: all of this while trying to resolve  
18 the medical issue which made me seek refuge in the  
19 first place (see #16, line 15-20).

20 All of this was stressful and would cause me,  
21 later, to seek relief from counseling.

22  
23 (#41) When I moved into the YMCA, as previously  
24 stated; of the approximately 90 residents only three  
25 were Black; one on each floor. I was told that one  
26

- Over -

1 resident, John McConnell, was "allowed" to call me  
2 'nigger' (see #18, lines 25-3). Whenever I tried to Att  
3 end "Y"-sponsored activities (e.g., movie night, game  
4 night) that is exactly what he did. No one in the room  
5 ever objected. Other incidents included: having a  
6 bunch of bananas hung on my door knob; another res  
7 ident, "Buddy" pulled a banana from his pocket and  
8 asked if I 'wanted some lunch'; Vanessa, the recep  
9 ionist, once when I entered the building, handed m  
10 a canvass bag filled with donations. As I walked by  
11 people in the lobby were laughing. I got upstairs an  
12 noticed one side of the bag said 'save the chimpanzee  
13 with the picture of a chimpanzee on it. I kept the  
14 bag — they retrieved it.

15 The YMCA has been my only residence since comi  
16 to Maine. Though the racial make-up of the residential  
17 program has changed, the harassment to myself has no  
18 It has been a long (over ten years) period of humiliation  
19 and has been degrading, debilitating and stressful.

20

21 (#42) One week after moving into the YMCA I began  
22 working, March 20, 2010. A few days after starting; up  
23 my return, "Buddy", met me at the elevator and said,  
24 'we want some of those pills'. He went on to describe  
25 the prescription pain meds that I had when I moved in

26

— Over —



1 I told Bill Bormet the residential director that my room  
2 had been searched, he said it could not have happened. Wh  
3 I insisted that it did; he became adamant. I got the  
4 message.

5 I was soon being extorted for pain medications  
6 which I began receiving regularly (from 2010-2017) from  
7 Dr. James Katz. My room was entered often and they  
8 took whatever they wanted. I did not have the resour  
9 ces to either move or buy furniture, again it was hum  
10 iliating. Someone asked me how I got into the YMCA so  
11 fast: in hindsight they may have thought I came to  
12 Maine to sell drugs (see #18, lines 13-15). This theme kept  
13 coming up over and over.

14  
15 (#43) By July of 2011, after having made a trip to  
16 City Hall to see Doug Gardner concerning GA issues: the  
17 community harassment became intensified (#28, lines 18  
18 2 of next page). At the YMCA specifically, every time I woul  
19 enter the building; as I would come to my floor, the sam  
20 resident would have his body up against the elevator door  
21 so that when it opened we were face-to-face. I would the  
22 have to back up and let him on to get out. It was odd at  
23 first, but when it happened over 20 times - it became  
24 harassing and had to be coordinated by someone letting  
25 him know when I entered the building. If this sounds sill

26

—Over—

1 it is! Every time I would go to the washroom down the  
2 hall to clean meats or vegetables I would come into the  
3 hallway and have to walk through several people on m  
4 floor who would line up on each side. The crowd grew fro  
5 four to 10 at some points. When I would come out of the  
6 bathroom, someone would "bump" into me going in. Wh  
7 is an occasional incident became constant. I was onc  
8 "bumped" in Hannaford's Supermarket nine times in  
9 one visit. I was constantly taunted in an effort to get  
10 me to fight. I would not give in. Eventually the res-  
11 idents would tire of one thing and try something els  
12 Most was too silly to report.

13 Due to the escalating intensity of the bullyin  
14 I would often just stay to myself. The one place the  
15 could often bother me was at the elevator (I soon be  
16 gan to avoid riding with others - pre-COVID). These pro  
17 blems did not begin and won't end with the current sit  
18 uation with the pandemic!

19  
20 (#44) After months of enduring harassment by resid-  
21 ents and staff, another problem arose: insect infestation. Th  
22 became another way to harass and extort. I would seek  
23 help for weeks and if I heard nothing from staff some-  
24 times I would have to go through another resident.

25 The bug situation was not just nasty it was humil

26

—over—



1 iating. Sometimes while out in public I'd have to worry about  
2 bed bugs crawling across my clothing, I felt as this was be  
3 ing used as an effort to get me to either move out or to  
4 comply with the negative things going on.

5  
6 (#45) In February of 2014 I had just been kicked off  
7 MaineCare and Foodstamps, but had decided to get a pro  
8 cedure done on my hand. I called Mercy Hospital and spok  
9 to Katie Kerr. She told me I would have to fill out an app  
10 lication. One day I went to the washroom to wash dishes  
11 and another resident, Daniel Tucker, came in behind me als  
12 with his dishes; Katie called. Daniel started banging loud  
13 ly so I couldn't talk. I went back to my room to call Katie  
14 I was told Katie had just left. At the time I thought Da  
15 niel's actions were justified; after all he had things to  
16 do also. However, over the next ten days the incident  
17 played out three more times with him; the dishes, and  
18 Katie Kerr!

19 This was well planned and the harassment by Da  
20 niel became so bad I began going to other floors to use  
21 the bathroom; and, doing dishes one at a time as to not  
22 spend much time dealing with him (and others) on my  
23 floor. I gave up on trying to get that procedure on my  
24 hand and suffer pain from it (my writing hand) to this  
25 day.

26

—Over—

1 (#46) In February of 2014, shortly after the incident  
2 described in (#45), I made a trip to Pennsylvania to go  
3 to the EEOC of Philadelphia still trying to adjudicate the  
4 suit filed in November of 2007: this was the second such  
5 visit; the first being in November of 2011. While there I  
6 also went to the U.S. Attorney's office. When I returned  
7 to the YMCA, as I was putting my key in my door,  
8 the first thing I heard as a staff member left John  
9 McConnell's (see #41, lines 1, 2) room was, "we're getting  
10 rid of him." A couple of weeks later I got a call from  
11 Katie Kerr - Patient Advocate for Mercy Hospital: This  
12 time I did not call back.

13 Throughout 2014 I was still being subjected to  
14 harassment, bullying, "gaslighting", COINTELPRO-style  
15 (#12, line 23-4 of next page) community surveillance, and  
16 stalking. This along with the rampant drug usage at the  
17 YMCA; which resulted in an inordinate amount of deaths  
18 (two in July alone; Jason Baron, July 14, 2014 and Donald  
19 Harmon, July 28, 2014 both on my floor), I decided to go  
20 to the Portland Police Department which I did on Jan  
21 uary 6, 2015. (#36, lines 5-7). The next day, Bill Bormet  
22 director of the residents was gone; though a letter was  
23 passed to everyone at the end of February stating that  
24 Bill was "leaving indefinitely". I kept that letter; they  
25 took it!

26

— Over —



1 (#47) From the time that I moved into the YMCA on  
2 March 14, 2010 until January of 2015; when I went to the  
3 Portland Police Department (#31, lines 2,3) and Bill Bormet  
4 left as director of the Men's Dormitory; there was a racket  
5 going on. At the time that I moved in the clientele was  
6 very young and very transient. Clients (residents) were get-  
7 ting kicked out or arrested frequently and after 30 days the  
8 property was sold. Secondly; certain residents had keys to  
9 the rooms and would often go room-to-room syphoning off  
10 small quantities of pills and goods (often pulling fire alarm  
11 to get people to leave) so that other residents would not  
12 notice. Thirdly; drug dealing, extortion and threats  
13 were prevalent.

14 When Bill Bormet left people were angry. I  
15 faced harassment, bullying, stalking, intimidation, and  
16 threats of violence by everyone from residents to  
17 custodians, staff members, receptionists and several  
18 residential directors who've come in since.

19  
20 (#48) By 2016 Eddie Barajas was the director of  
21 the Men's Dormitory. Before I had formally met Eddie, he  
22 approached me in an aggressive manner when I came  
23 through the handicap door. This was a familiar source of  
24 harassment by staff since my surgery (#21, lines 21,22)  
25 but I was surprised because I did not know him. I very

26

- over -

1 quickly understood that the harassment was going to  
2 continue through him (which it did); and I chose to av  
3 oid him.

4 On February 20, 2016 my mother passed away. She  
5 told me before passing that she was leaving everything  
6 me as she and my sister (my only remaining sibling) did not  
7 get along. On March 3, 2016; my sister sent a fax to Eddie  
8 Barajas in which she asked him to get me to sign a lett  
9 er of renunciation. Eddie was, of course, not a friend of  
10 mine, nor a counselor, mentor, advocate or any kind of  
11 caseworker. I was extremely upset by this; he could have  
12 left this note under my door. Instead he tried to force me  
13 to sign it. I was intimidated by this.

14 On March 25, 2016; the day of the Clinton vs. Sanders  
15 New York primary; I went to the Portland Public Library  
16 where I intended to get a death certificate for my mother  
17 and return home to watch the results. Instead, I was  
18 stopped at the copier by the Chief of Security (formerly a guar  
19 at General Assistance and walked to the security office  
20 (by the exit) to talk to me about something minor. Though  
21 I did finally get a copy I never got the chance to use it.

22 A few weeks later Eddie came to my room again  
23 saying, "Come on Greg let's get these papers signed". Again  
24 I found this extremely intimidating; and I finally, due  
25 to stress, gave up. My sister, Judith Ann Sullivan, gave  
26

— over —



1 ed my rightful inheritance through harassment, intimid-  
2 idation and theft; and did so across state lines; with  
3 the assistance of Eddie Barajas.

4  
5 (#49) Eddie Barajas left the YMCA of Portland, Maine  
6 in March of 2017 and was replaced by Branden P. Ananis  
7 as Director of the Men's Dormitory.

8 On July 11, 2017 I went to the Federal Courthouse  
9 to seek information on filing this very lawsuit (though r  
10 actions have been delayed; the crimes and infractions kept  
11 piling up). When I returned to the YMCA, the reception-  
12 ist, "Roberta", knocked on my door to tell me my father  
13 was ill. The very next day staff member Ray Emerson car  
14 to tell me my father had passed away. I said, "O.K." and  
15 shut the door. He knocked again and said, "No, really  
16 your father passed. Again, I said "O.K." and shut the  
17 door. He knocked yet a third time; this time he began  
18 making hand gestures and miming as though we were  
19 having a conversation or he was expressing condolences  
20 this in front of the cameras at each end of the hall.

21 By this time it was known by many that I was act  
22 ively trying to bring closure to this long-running righ  
23 mare. This was more "gaslighting" and intimidation.  
24 wanted to slam the door in his faced but I feared the  
25 consequences.

26

— Over —

1 (#50) In January of 2015 I became very ill and  
2 was unable, briefly, to take care of personal business. I  
3 had no money; though I should have been able to coll  
4 ect MaineCare Disability; and I could not get to Gener  
5 Assistance for my rent and food vouchers. I tried in  
6 vain to get someone at General Assistance to tell me ho  
7 to clear this hurdle; they would not. Finally, I called  
8 the office of City Manager John Jennings. I was also  
9 given the number of Ethan Strimling; neither would  
10 return my calls (I had also gone to the City Manager's  
11 office in 2015, after speaking to Dawn Stiles and rep  
12 orting theft of benefits (#32, lines 24,25) with the sam  
13 results).

14 One day YMCA staffmember Ray Emerson knocke  
15 on my door with a young man from Ehrlich Pest Control  
16 who came every three months to spray. I told him th  
17 I was too ill to leave for the treatment. Ray said th  
18 they just needed to check for bugs. The worker ther  
19 came in, went by my bed where my phone was and  
20 turned his back to me. When he left my room I imm-  
21 mediately checked my phone and found all calls to  
22 City Hall deleted. I immediately began making mor  
23 calls; finally General Assistance sent a taxi for me  
24 and I went to pick up my benefits.

25 This was one more instance of different entitie

26

— over —



1 collaborating to deprive me of benefits in a very harass  
2 ing; intimidating and insulting manner.

3  
4 (#51) On November 22, 2018 I stepped out of my  
5 room about 2:00 a.m. to wash dishes while avoiding  
6 others, as was my habit. When I opened the door—the  
7 stood Director of the Men's Dormitory Branden P. Ananis  
8 talking with a young woman (who I later learned was a  
9 friend of the young man across the hall). Feeling that  
10 something untoward was going on, I went back into my  
11 room. As I was going in I heard her say, "I need to get  
12 my stuff". Later, I washed my dishes; and then I went  
13 to another floor to take a shower. I then began looking  
14 for something and happened to search a piece of luggage  
15 age that I had not used in a long time: there I found  
16 some female hairstyling tools. I was incensed! It  
17 was not lost on me that a screenshot from the security  
18 cameras would have shown Branden; the young  
19 woman; and myself briefly outside of my room — and  
20 then her "stuff" turns up in my closet. I went down  
21 stairs to confront Branden but was told by staff member  
22 Lissette Rosado that he was gone. She told me we're  
23 going to get rid of them (the guy across the hall, and  
24 the young woman) tomorrow.

25 A few hours later I had an appointment

26

— over —

1 at General Assistance. When I got there I immediate  
2 got the sense that they knew about the incident at  
3 the YMCA. I knew for sure when my benefits were given  
4 to me and the fifty-eight dollars that was taken from  
5 me in 2015 (#32, lines 2-5) was restored by my caseworker,  
6 Matt MacMillan.

7  
8 (#52) I had finally gotten my Foodstamps back in May  
9 of 2018 via the Maine Hunger Initiative (though they  
10 still denied me MaineCare). However, in February of 2019  
11 after a strange encounter with Kristen M. Ellensohn  
12 FNP at the Mattina R. Proctor Diabetes Center (full explanation  
13 in later paragraphs); I finally got my Maine  
14 Care restored also. I now felt more empowered to again  
15 try to seek adjudication of past legal issues and full  
16 restoration of all that was taken from me.

17 I then, in March of 2019, called my son and spoke  
18 of my mother's passing. I related to him that my sister  
19 had "done something foul" and I hoped he was not  
20 involved. I also exchanged a few phone calls and several  
21 text messages with my sister, which quickly turned  
22 negative. Soon I again fell out of touch with them  
23 both. Several months later a meeting was held at the  
24 YMCA in which the residents were told that Eddie  
25 Barajas would be returning as resident director. I

26

—over—



1 knew this would be problematic because of the incident  
2 with the letter of renunciation (#48, lines 7-13; 22-25).

3  
4 (#53) In January of 2020 (shortly after the five year  
5 tolling of my visit to the Portland Police Department had  
6 expired #36, lines 5-7), Eddie Barajas was back at the  
7 YMCA. At this time I was actively pursuing this very  
8 lawsuit, and having access to my room, the staff at the  
9 YMCA knew this. Eddie not only approached me inside  
10 the building but when I left building he would app-  
11 roach me in the street. When I asked for a receipt  
12 after paying my rent I was told to see Eddie. If I  
13 asked for a copy to be made on the copier, I was told to  
14 ask Eddie: this to make it appear that he was my  
15 caretaker; he was no such thing.

16 In June of 2020 I began doing searches on  
17 my cell phone concerning legal statutes. I looked up  
18 the statute for stalking, harassment, and intimidat  
19 and suddenly I could no longer use my phone. When  
20 ever I turned it on it said "phone is reconfiguring".  
21 I called for a replacement and was told I could not  
22 get one; it was too soon.

23 I lost all searches of legal materials plus  
24 the images from my camera that I had taken of  
25 the fraudulent Social Security process that Kristen

26

— over —

1 Dow had sent me to (# 35, line 9-13). I had no phone  
2 through several of the worst months of the pandemic.  
3 The phone number that I had at that time was (207  
4 408-8403; when I finally got my new phone in May  
5 of 2021, the number was similar (207 450-8503), but be  
6 longed to someone else! I turned on a brand new cell  
7 phone with someone else's Facebook already on it.

8  
9 (#54) In November of 2020 Eddie Barajas informed  
10 me that I needed to provide him with documentat-  
11 ion of my disability in order to use the handicap e  
12 it; this, though I had been at the YMCA for over ten  
13 years, and; this was Eddie's second stint as director  
14 of the men's dormitory. We had been through this iss  
15 ue in 2015; and I had gone through this same nonsens  
16 with those who came before him.

17 In December of 2020 after being diagnosed with  
18 COVID-19, I went into a quarantine shelter for ten  
19 days. During that time I still had to deal with the c  
20 going harassment. I was rushed out of the YMCA with  
21 out time to get all of my medications: when I contin-  
22 uously asked for them, I was asked if I really needed  
23 them. "You're not going to die if you don't get them are  
24 you?", I was asked. Eddie Barajas called one day and  
25 asked what my symptoms were. I was already in

26

— over —



1 quarantine and the YMCA is my landlord, why would  
2 he need to know that! I told him I am dealing with  
3 the Maine CDC concerning my health. He said if I did  
4 not tell him, he would call the Preble Street Shelter to  
5 find out. Blatant harassment.

6

7 (#55) On December 27, 2020 I returned from COVID  
8 quarantine to the YMCA to find out that Eddie Barajas  
9 had been replaced by Trevor Prophet as the Director of  
10 the Men's Dormitory (though Eddie remained at the "Y"  
11 until March of 2021). I soon noticed three things which  
12 affected me personally.

13 First, there would be a continuation in my  
14 struggle to go in and out of the handicap exit. I  
15 told Trevor of Eddie's edict that I had to show him  
16 proof of my disability (#54, lines 9-16) and though  
17 I finally complied, Trevor told staff members that I  
18 had to have a cart to use the door. This was demeaning.  
19

20 Secondly, there was a continuation in the pattern  
21 used both at the YMCA and other entities; of taking  
22 things away (privileges, property, resources, etc.) from  
23 those who refuse to conform to the wishes of those  
24 involved in wrongdoing (#27, lines 7-9). Shortly after  
25 my phone was rendered inoperable (#53, lines 19, 20)

26

— OVER —

1 a staffmember gave me a television that was donated  
2 to the YMCA. Inexplicably, that staffmember, Kimberly D  
3 Lopez, confiscated my television. Soon the donated TV  
4 proved to be defective, leaving me with no source of  
5 entertainment or access to news during some of the  
6 most distressing months of the pandemic. I related  
7 this to Trevor in March of 2021, he said he would "investigate the matter. I heard nothing for months. In Jun  
8 of 2021 I went to the Federal Courthouse to prepare for  
9 this very document. In July Trevor Prophet and Lisette  
10 Rosado knocked on my door and removed my toaster oven  
11 (I've had one at the YMCA for ten years). After press-  
12 ing Trevor I finally got my T.V. (I found that the phone  
13 had the chip removed)!

15 Thirdly, in addition to the harassment that I  
16 had been subjected to for years by Daniel Tucker (#45  
17 lines 10-18) and others; a new crew of residents emerged  
18 which seemed intentionally purposed to harass and in-  
19 timidate. These residents: Tim Hubner; James Moseley  
20 William Garland; Michael Barker and Brent Sentholtz  
21 began stalking, harassing and intimidating on a reg-  
22 ular basis after Trevor became director; with the latter  
23 two threatening me with physical violence. After my  
24 visit to the Federal Courthouse in June of 2021 a lot  
25 of it shut down, not coincidentally!

26

— over —



1 (#56) Concerning more recent medical problems: on 5/31/18  
2 I began visits at the Mattina R. Proctor Diabetes Center at  
3 Mercy Hospital. I first saw Dr. John T. Devlin, MD but soon  
4 my care was taken over by Kristen M. Ellensoh, FNP. At  
5 around this same time I was told by Megan L Black, NP  
6 that she would no longer see me as a patient at Portland  
7 Internal Medicine. I had been transferred to Megan by  
8 Charles Therrien, Mercy Hospital President after a meet  
9 ing in 2017.

10  
11 (#57) During one of my first visits with Kristen, I  
12 informed her that the Metformin that I was taking  
13 was causing me immense pain. She spoke with me  
14 about several alternatives but never changed my pre  
15 scription.

16 As time went on during my visits I began  
17 to notice a pattern where Kristen would mention  
18 persons or facilities that were potential defendants  
19 in this very lawsuit (to my discredit this process has  
20 taken way to long and started prior to my visit to  
21 the Portland Police Department in January of 2015  
22 see # 31). At one point she brought in a copy of a doc  
23 ument from the office of Samuel Scott, MD of Maine  
24 Orthopedics and slammed it on the desk shouting,  
25 "you signed this".

26 — over —

1 (#58) On 1/9/19 I had a physical examination performed  
2 by Kristen Ellensohn. At that time I showed Kristen the  
3 area of my operation (right great toe) and showed her the  
4 point where the screw was pushing through the skin; I  
5 also showed her that my toe was purple and showed  
6 her the swelling of my toe and foot and also made note  
7 of the swelling of my right hand (for which I was treated  
8 by Dr. Samuel Scott of Maine Orthopedics).

9 When I received my summary at the end of the  
10 visit there was no mention of anything that took place  
11 I asked her to document what she saw. At first she refused;  
12 but then she angrily relented. I was angry also.  
13

14 (#59) On 1/31/19, when I went in for my visit, the first  
15 thing I told Kristen was that I was tired of the impromptu  
16 depositions she was subjecting me to. I also asked her for  
17 a copy (and review) of the blood tests I had done back in  
18 September of 2018. She refused to go over the results. When  
19 she left the room a man came in and introduced himself  
20 as my caseworker. His name was Brendan Johnson. I  
21 told him that I did not ask for a caseworker. He then  
22 said, "full disclosure; I represent Mercy Hospital, Maine  
23 Medical Center, and the City of Portland; I'm with the  
24 Minority Health Program". I asked him for a business card  
25 he had none; Brochures about the program, he had none  
26

- over -



1 (#60) Brendan Johnson promised to help me get my  
2 MaineCare back which he did in less than two weeks  
3 and, although I appreciated it, I knew it came through  
4 nefarious means. In anticipation of this suit which they  
5 knew was coming, the three entities that he said that  
6 he represented had interests that conflicted with mine.  
7 I soon began to see a pattern of their playbook:

8  
9 • lead me to all of the institutions which had  
10 previously discriminated against me that way they  
11 could mitigate all of the negative things that were  
12 done to me while also exculpating all of those that  
13 were involved

14  
15 • get the doctors at these places to make it  
16 appear that I no longer have any medical problem  
17 though I've been deemed permanently disabled  
18 for years; thereby absolving DHHHS of responsibility  
19 for denying me MaineCare Disability.

20  
21 • make it appear that I have mental or  
22 cognitive issues that would make all of my alleg-  
23 ations seem false.

24  
25 • make it difficult for me to do business or  
26 — over—

1 obtain prescriptions or provisions as a way to dissuade  
2 me from moving forward.

3

4 (61) On 2/11/19, less than two weeks after telling Krister  
5 Ellensohn that I was tired of her impromptu deposition  
6 I had my first appointment at Greater Portland Health  
7 after being told by Portland Internal Medicine that I  
8 could no longer be seen there for dropping Dr. James Katz  
9 as my primary care physician (this in spite of the fact that  
10 I had two visits with Megan Black, PA-C).

11 When I went in, I was told by a nurse's aide, "you  
12 know, she doesn't have to write you any prescriptions". I  
13 took this to mean that if I wanted to be treated I'd  
14 better be agreeable. As soon as Gretchen Speed came in  
15 it was an extension of what I experienced with Krister.  
16 I knew going in that I would not be a patient, however,  
17 and she did write me prescriptions for three months, so  
18 I did not complain.

19

20 (# 62) After calling DHHS and specifically asking for  
21 'no Mercy, no Maine Med, and no City of Portland  
22 affiliated physicians; I was set up with Dr. James  
23 Riddleberger of Martins Point Health Care.

24 On my first appointment, 4/15/19, I told Dr.  
25 Riddleberger that I was experiencing severe pain

26

— over —



1 as a side effect from my Metformin medication. I asked  
2 if he could change it: he refused. I found that odd. In  
3 order to keep from beginning another long-running issue  
4 like I had at Mercy Primary Care / Portland Internal  
5 Medicine, I asked to speak with someone from their  
6 administration. A few days later I met with a woman  
7 for about forty-five minutes. When the meeting was over  
8 she said, "I hope you felt heard". I felt I was being  
9 patronized. I asked for her businesscard for future  
10 references. It was then that she admitted that she was  
11 not from administration. She tore off a piece of paper  
12 and wrote her name, Lori MacDonald on it. I was  
13 incensed! This same pattern had been used at Mercy  
14 Hospital, the Portland Police Department and now at  
15 Martin's Point.

16 On 4/26/19 I met with Flora Cilley - Manager  
17 Practice Operations. She asked if I would like another  
18 physician - her idea not mine. I agreed. She later told  
19 me that it would be a while; the doctor would be  
20 coming from another facility. I was set up for at least  
21 two more appointments with Dr. Riddleberger, and  
22 although I asked every time for a summary of my  
23 visit I got none.

24  
25 (#63) On 9/26/19 I had my first appointment with  
26 -over-



1 Dr. Pamela Courtney, DO. The first question that she  
2 asked was what state was I from. When I said  
3 Pennsylvania she told a xenophobic joke about the  
4 Amish. I got the impression that she had one for  
5 every state. It was offensive; I let her know that. The  
6 appointment did not last very long as it was described  
7 by Dr. Courtney as a "meet and greet". I filled out some  
8 paperwork and left. A few months later the pandemic  
9 began and I, like many others, was prevented from  
10 going in to the office but continued getting my  
11 prescriptions at the pharmacies.

12  
13 (#64) Throughout 2020 I managed to get by without  
14 going back to the doctor's office. Even though the  
15 pandemic was still ongoing I soon realized that I  
16 was being pushed by GA to have the doctor fill out  
17 Workfare paperwork, though by October of 2020 I  
18 was almost sixty years of age. I felt that Dr. Courtney  
19 was supposed to write a negative report in another  
20 attempt to force me out of the General Assistance  
21 program. Upon insistence I finally got summaries  
22 of my doctor's visits: four at once; three for Dr.  
23 Riddleberger and one for Dr. Courtney. They were full  
24 of false statements and inaccurate information.

25

26

- over -



1 (#65) By February of 2021 I was told by the office of  
2 Pamela Courtney, DO that they would no longer write  
3 any prescriptions without a visit. I had no interest in  
4 seeing her again so again I called MaineCare and  
5 asked for a new doctor. They told me that every doctor  
6 in the Portland area was affiliated with Mercy, Maine  
7 Medical Center or Martin's Point. Against my better  
8 judgment, I let them give me an appointment at  
9 Maine Medical Partners. Again I must add that they  
10 were aware that I was preparing this claim, yet I  
11 felt that everyone could act professionally and treat  
12 each other respectfully.

13 On 4/26/21 I had an appointment with Dr.  
14 Katie Szanton. Just a few minutes into the meeting  
15 she said she wanted me to take a psychiatric evaluation  
16 I soon felt uncomfortable with it as I was in a mask  
17 and struggling to breathe in a very small room (I have  
18 asthma). When I asked her to end it she began trying  
19 to put me on psychiatric medications. She kept asking  
20 me "what do you like"? I felt this was strange. I went  
21 through several medications that I knew of and she  
22 kept saying no. When I got to Prozac she lit up. She said  
23 "you mean Fluoxetine?", I said "yes, but I'm allergic to  
24 gel caps." She told me she would call the pharmacy and  
25 talk to them. I told her "NO, I don't want any. She  
26

—over—



1 seemed to deflate. I knew then that she was aware  
2 of an incident in 2012. I went to a physician at  
3 Opportunity Alliance named Karen Olson. Though I  
4 told Dr. Olson that I was allergic to gel caps she told  
5 me, "well that's what I'm giving you", and wrote me  
6 a prescription for Fluoxetine. I did not use it much  
7 because it made my breathing difficult, but in  
8 November of 2012 I had an appointment at General  
9 Assistance which I knew would be stressful and I  
10 took a pill. On that meeting the caseworker told me  
11 that she was kicking me out of the program, she began  
12 irate slamming her hand on the desk. When I left GA  
13 I had another appointment with Dr. Olson.

14 When I got to Dr. Olson's office I began to  
15 go into an intense asthma attack. I was taken  
16 to her office where I picked up the phone to call  
17 for help. She snatched it from me and made a call. She  
18 was terrified. She dialed a number and told the person  
19 on the other end, "He's here right now"! "He can't breathe"  
20 She then hung up and kept shouting, "It wasn't me,  
21 I didn't do it." She would not call an ambulance. I  
22 could not. Several months earlier, at the Big Apple  
23 store, I was told by an officer that if I called 911  
24 again I would be arrested (incident described in  
25 (# 39).



1 It seemed that Dr. Szanton knew about this  
2 incident and tried to get me to accept this  
3 prescription in order to mitigate Dr. Olson's actions  
4

5 (#66) Finally, I called DHHS (MaineCare) and told  
6 them that I would have to seek health care  
7 outside of Portland for legal reasons. They gave  
8 me a number for St. Mary's. When I called on  
9 July 27, 2021 they gave me an appointment two  
10 months away on September 27, 2021. That, in effect  
11 made me go back to Portland emergency rooms for  
12 meds.

13 On September 27 I got a call at 7:27 a.m. as  
14 I was about to get a ride to St. Mary's. I checked  
15 my phone and the message said that the doctor,  
16 Carly Laverrière would not be in. She cancelled  
17 at the last minute. I needed medications so I had  
18 to, again, go to Mercy Hospital. They then gave me an  
19 appointment for October 4, 2021 (St. Mary's).

20 On October 4th I went to St. Mary's and met  
21 Carly Laverrière. She was nasty and abrasive and  
22 made several references to my visit to Maine Medical  
23 Partners. When I left she told me that she would  
24 not write my prescriptions for three months which  
25 is a requirement for MaineCare. I asked for a

26

—over—



1 summary so I could at least make sure that all  
2 of my prescriptions were written up. She told me  
3 she would mail it.

4 When I got back home I found out that I  
5 could not get any medications because she only  
6 wrote them for one month. When I tried to get  
7 the City of Portland to pay with vouchers I was  
8 told that the most important medication could not  
9 be dispensed because she didn't write the correct  
10 dosage.

11 Later the hospital told me, "We don't know why  
12 she did that. We don't do that here." A different  
13 doctor then wrote my scripts. I tried to get another  
14 physician at that location; I could not. I tried to  
15 report the incident; I could not. I would cancel a  
16 later appointment with Dr. Laverrierre because I had  
17 been told, at first, that they would give me someone  
18 else.

19 I am currently trying to find a physician who will  
20 treat me respectfully and professionally.

21  
22 (#67) During my time in Maine, from 3/10/10 until  
23 now, I've had many disturbing incidents happen to  
24 me most of which occurred through the process of  
25 trying to procure medical care. One person in

26

—over—



1 particular seemed to be involved in several of these:  
2 Joseph R. Rolland PA-C.

3 On July 4th, 2012 in the incident described in  
4 (#39) at the Big Apple store, I was denied access to  
5 an ambulance ride, but, instead of going to Mercy  
6 Hospital's Emergency Department; I took the longer  
7 walk to Maine Medical Center. I did this because of  
8 the poor treatment I had received constantly through  
9 Mercy as opposed to few at Maine Medical Center at  
10 that time. When I arrived I was being treated by  
11 an intern (I believe), when in walks a doctor who  
12 I had been treated by at Mercy. At that time I did  
13 not know his name but I soon became familiar with  
14 Joseph Rolland.

15 When he came in I was complaining of back  
16 pain (he had treated me for my toe injury). He began  
17 giving me things to do such as twisting this way,  
18 and that; and suddenly he told me to hop up and  
19 down on my left foot then right foot. I stopped,  
20 looked at them and said "I can't do that". They both  
21 started laughing. He then told me that he could  
22 not take X-rays for two reasons: One, he didn't  
23 want to expose me to all of that radiation, and, two  
24 he didn't want to because it would cost too much.  
25 When I asked to be transferred to a different facility,

26

—over—



1 they took me in for X-rays, I never heard anything  
2 about those X-rays.

3 On May 25, 2016, I made my way to Mercy E.R.  
4 in extreme pain due to the recurring problem with  
5 my right great toe. I had the initial operation on  
6 July 8, 2010 (#21), and another short procedure to  
7 fix the problems on June 22, 2014. When I arrived  
8 I was left in the waiting room for an extended  
9 period and then was put in an observation room for  
10 another extended period. Finally Joseph Rolland PAE  
11 walks by, he doesn't stop. he just motioned for my  
12 to follow him. He took me back out to the waiting  
13 area and left. When he returned he handed me some  
14 discharge paperwork to sign myself out of the E.R.  
15 without being seen! I refused to sign the papers so  
16 he asked for them back. I told him no. He then offered  
17 to take me in for observation, again I declined. I  
18 then left and limped to Maine Medical Center.

19 On May 25, 2016 at Maine Medical Center I had  
20 the third procedure on my right great toe. It was  
21 excruciating. That procedure was performed by Meghan  
22 McNally. My blood pressure on that date was 170/102.

23 On May 22, 2017, I had a meeting with Mercy  
24 CEO Charles Therrien about the care I had been getting  
25 at his facility. During that meeting I discussed the

26

—over—



1 situation with Joseph Rolland. I asked at that time  
2 that I not be seen by him if I had a hospital visit. I  
3 had several visits to the emergency room afterwards and  
4 would always ask upon arrival that I not be seen by  
5 Joseph Rolland. On 2/17/18 while in an observation  
6 room at Mercy I told the physician's assistant that I  
7 did not want to be seen by Mr. Rolland. She asked if  
8 I would like to speak with him, I said NO. Joseph  
9 Rolland then came and "treated" me from outside of  
10 the room through that physicians assistance it was  
11 not only bizarre but disrespectful and done in a poor  
12 attempt to mitigate his past behavior.

13  
14 (#68) Similarly, throughout most of my time in  
15 Maine I've had to rely on the General Assistance  
16 program for support; And also during this time I've  
17 had a similar situation with Tammy Morse. Though  
18 Ms. Morse was not supposed to be handling my case  
19 after I met with Doug Gardner at City Hall (#28),  
20 she would be assigned to me whenever I made any  
21 attempt to adjudicate my legal issues.

22 In the summer of 2011, I sent an E-mail to the  
23 Delaware County Republican Party Headquarters in which  
24 I detailed the fraud and abuse at Chester Water  
25 Authority. That E-mail was sent from the Portland Public

26

—over



1 Library. The next day I went back and found that my  
2 Yahoo account had been hacked and was now inaccessible.  
3 In November of 2011 I went home to Pennsylvania both  
4 to visit and to again try to adjudicate my case against  
5 Chester Water Authority. I visited several National  
6 Employment Lawyers Association (NELA) members and  
7 also went to the EEOC to pick up an application to  
8 file again. I soon returned to Maine, where I would  
9 fill out the application and mail it to the EEOC.

10 At the YMCA I entered my room one day and saw  
11 a large manila envelope amongst my things. When I  
12 opened it, it was an "invitation" to go to the Office  
13 of Disability Adjudication and Review (ODAR). I  
14 ignored it. I knew at this point that nothing good was  
15 going on in Maine. How did it get in my room? I had  
16 been denied when I first came to Maine. Why was it  
17 not put in my mail box? Probably because that would  
18 have violated the law.

19 After a few weeks I went to GA to find that I  
20 was paired with Tammy Morse. She asked if I had  
21 gone to the people at Social Security, I said no. She  
22 said "those people want to see you." How did she know?  
23 I felt coerced, so I made an appointment: [REDACTED]

24 [REDACTED]

25

26

- over



1 (#69) After the visit to Pennsylvania I decided to  
2 call a former co-worker, Ms. Estee Dukes of Chester  
3 Water Authority because after I sent the e-mail to  
4 the Delaware County Republican Party Headquarters,  
5 I felt that something would stir but hadn't heard  
6 anything. Ms Dukes told me that Robyn Bennett was  
7 no longer employed by CWA; she had been fired for  
8 insurance fraud which was what I had said in the  
9 e-mail. She advised me to call her replacement who  
10 was Carolyn Joyner.

11 When I called Ms. Joyner she began yelling  
12 saying that she had just got there! When I called  
13 a couple of weeks later I was told to write a  
14 letter to CWA saying that I would not sue! I  
15 never did that, I would never be extorted after  
16 all I'd been through. I'd rather fight on.

17  
18 (#70) The day following the call to Ms. Dukes I  
19 got a call from Robyn Bennett. I don't know how  
20 she got my number, but she soon began to  
21 threaten me; telling me that I could not sue  
22 because "you're up there committing crimes. I  
23 don't know what crimes she was speaking of but  
24 she sounded desperate. She herself may have been  
25 facing charges over her work at CWA.

26

— over



1 (#71) In 2014 I made another trip to Pennsylvania  
2 in order to visit and to again seek justice through  
3 adjudication at the EEOC concerning CWA. I went to  
4 the EEOC and picked up filing forms; I then filled  
5 them out and went to see a NELA attorney at 302  
6 W. State St in Media, PA. I left a copy.

7 On February 24, 2014 I went to the EEOC to  
8 file. A woman came into the waiting area and asked  
9 for all of the written forms. My form was "collected".  
10 When I asked the woman her name, after a very long  
11 pause, she told me Joan Gmitter. I had spoken to her  
12 many times over the phone (#13, 5, 6) but had never  
13 met her in person. She and Ms. Diana Schley who had  
14 taken my complaint in 2007 were central to the one  
15 that she just took. I knew she had just done wrong  
16 but who could I speak to? She was a supervisor! I  
17 left feeling shaken and depressed. From there I went  
18 to the U.S. Attorney's Office to again report the  
19 insurance fraud at CWA. Nothing!

20

21 (#72) When I got back to the YMCA from my trip  
22 to Philadelphia, there was a staff member coming  
23 out of the room next door. He told me, "we're getting rid  
24 of him." He was speaking of John McConnell who  
25 had called me 'nigger' for years,

26

— over —



## 1 Harm to plaintiff and others

2

3 (#73) Defendants in two states, in two separate and  
4 distinct fraud enterprises have committed multiple  
5 civil and constitutional rights violations; through  
6 a pattern of racketeering activity, which have  
7 impacted many unsuspecting citizens including  
8 plaintiff Sullivan and the class of individuals he  
9 seeks to represent. As a result, plaintiff and others  
10 similarly situated including dozens in Pennsylvania  
11 and hundreds, if not thousands in Maine, have  
12 suffered damages.

13

## 14 Class Action Allegations

15

16 (#74) Pursuant to Rule 23 of the Federal Rules of  
17 Procedure, plaintiff, on behalf of himself and all  
18 others similarly situated, seeks to certify two  
19 separate Classes defined as follows:

20 1) all persons who were employed by CWA  
21 between March 1, 1999 until present and are either  
22 of African-American descent or disabled and were  
23 in turn, affected by defendant's abusive and  
24 fraudulent medical and insurance practices  
25 (hereinafter Pennsylvania Class Members). 1

26

—Over



1 The identities of individual Pennsylvania Class  
 2 Members are ascertainable through, among other  
 3 things defendants internal records. Members of  
 4 the Pennsylvania Class may be notified of the  
 5 pendency of the Class Action by numerous reasonable  
 6 means, including mail, e-mail, internet, publication  
 7 and other means; and

8 2) all persons in the State of Maine who are  
 9 of African-American descent (or African), or have  
 10 a disability; and have experienced discrimination  
 11 through Title VII, Title VI, the Americans with  
 12 Disabilities Act or discrimination in housing  
 13 between March 1, 2010 and present (hereinafter  
 14 the Maine Class Members).

15 The identities of individual Members of the  
 16 Class are ascertainable through, among other things  
 17 DHHS records, social services records, General  
 18 Assistance records, etc. Members of the Class may  
 19 be notified of the pendency of the Class Action by  
 20 numerous reasonable means, including mail, e-mail  
 21 internet, publication and other means.

22  
 23 (#75) Plaintiff Sullivan over the period of 23 years  
 24 beginning in March of 1999 and lasting to the  
 25 present, has run afoul of two fraud enterprises.  
 26 —over—



1 These enterprises shall be known hereinafter as the  
 2 Pennsylvania Fraud Enterprise and the Maine Fraud  
 3 Enterprise.

#### 4 5 THE PENNSYLVANIA FRAUD ENTERPRISE

6  
 7 (#76) Section 1961(4) of RICO defines an "enterprise"  
 8 as "any individual, partnership, corporation, association  
 9 or other legal entity, and any union or group of  
 10 individuals associated in fact although not a legal  
 11 entity."

12  
 13 (#77) The following "persons", as defined in 18 USC §  
 14 1961(3), have been members and constitute an  
 15 "enterprise" within the meaning of RICO, which are  
 16 referred to herein collectively as the Pennsylvania  
 17 Fraud Enterprise; an associate-in-fact enterprise.

18 a) Defendant Chester Water Authority (CWA);

19 b) the physicians, hospitals and clinics to whom  
 20 CWA sent its employees;

21 c) the International Brotherhood of Firemen and  
 22 Oilers SEIU Local 473;

23 d) Judge Dominic F. Pileggi (former Chester Mayor,  
 24 former Pennsylvania State Senator);

25 e) the Philadelphia Office of the EEOC.,

26

—over



- 1 f) Holsten and Associates of Media, PA;
- 2 g) Mark Alan Raith of Holsten and Associates of Media,
- 3 PA.

4

5 (#78) Defendants through a pattern of racketeering  
6 activity disallowed African-American employees of  
7 Chester Water Authority access to proper medical care.  
8 This access, however, was afford to white employees.

9 African-American employees were refused  
10 representation by the union and were also stifled  
11 by the EEOC. When Plaintiff Sullivan finally prevailed  
12 and went through mediation; upon failure to come  
13 to terms with CWA, the EEOC refuse to enforce their  
14 powers.

15 The company's insurance company, Holsten  
16 and Associates of Media, PA, for their part, refused to  
17 settle in a timely manner—through their agent Mark  
18 Alan Raith.

19

20 (#79) The predicate offenses required under 18 USC  
21 1962(c) (RICO) have already been established by  
22 the EEOC itself when it found "just cause" in  
23 2007 for Charge #530-2008-00072; for racial  
24 discrimination, violations of ADA and retaliation,

25

26

—over



1 As for Causes of Action, plaintiff complains more  
 2 specifically upon U.S. Code, common law, and the  
 3 Constitution of the United States of the defendants';

4 1 Conspiracy to violate and violations of

5 a) 18 USC 1961 - 1968 (a);

6 b) Denial of Due Process

7 c) obstruction of justice

8 d) violation of rights under color of law

9 e) fraudulent concealment

10 2. 42 USC 1981

11 3. 42 USC 1983

12 4. Violation of Title VII of the Civil Rights Act

13 5. Violation of Titles I and II of the CRA

14

15 The goal of the Pennsylvania Fraud Enterprise

16

17 (#80) The ratio of Black and white employees that  
 18 worked in the departments that plaintiff worked  
 19 in at CWA was split 50/50. Therefore, if half of the  
 20 employees (African-Americans) could be denied health  
 21 and insurance benefits; that would be quite a bit  
 22 of fraud.

23 The company, its doctors, and the union  
 24 conspired to subjugate and harass African-American  
 25 employees to fulfill that goal

26

—over



## MAINE FRAUD ENTERPRISE

(#81) The following "persons", as defined in 18 USC § 1961(3) have been members and constitute an "enterprise" within the meaning of (RICO), are referred to herein collectively as the Maine Fraud Enterprise; an associated in-fact enterprise;

- a) City of Portland, ME;
- b) Mercy Hospital;
- c) Maine Medical Center;
- d) General Assistance program;
- e) YMCA of Portland, ME;
- f) all listed Maine defendants;
- g) Judith Ann Sullivan of Tempe, AZ.

(#82) Defendants through a pattern of racketeering deprived plaintiff of the right to receive medical care in a proper fashion; the right to accommodations, and many of his civil and constitutional rights. When plaintiff wrote letters to Mercy Hospital in his first month in Maine, hospital CEO Eileen Skinner failed to make record of the complaint in order to hide the predicate offense. There were three denials of care at Mercy Hospital from March 13, 2010 to November 1, 2010. Then it really got bad.



the predicate offense and denial of benefits at the General Assistance office including theft of voucher money was extensive and is ongoing.

Defendants use constant harassment, stalking and intimidation in order to subjugate those who are out of favor.

Plaintiff complains more specifically upon U.S. Code, common law, and the Constitution of the United States, of the defendants:

- 1) Conspiracy to violate, and violations of
  - a) 18 USC 1961-1968(a);
  - b) obstruction of justice by Portland Police Department
  - c) denial of due process;
  - d) fraudulent concealment
  - e) use of mail in aid of racketeering
- 2) CFR § 11.406(a)(3) criminal coercion
- 3) 42 USC 1981 right to sue
- 4) 42 USC 1983 right to sue gov't agencies
- 5) Violation of Titles I and II of ADA
- 6) Violation of Titles VI, VII and VIII CRA

#### VIOLATIONS OF MAINE STATE LAW

Title 17-A § 905-C Theft of welfare benefits

Title 22 4450: ch. 13 concerning "back bills"

Title 17-A 353(1)(A) unlawful transfer of property

Title 17-A 355(1)(2)(A+B) theft

—over



5 MRSA 4582 unlawful discrimination in housing; and  
Defamation by Governor Paul Le Page.

### Goal of the Maine Fraud Enterprise

(#83) The goal of the enterprise was to fraudulently take money and resources, or deny benefits and accommodations to minorities, the homeless and those without resources to fight back. If someone chose to file charges against defendants the charges would be swift squashed by denial of due process, or the complainants information would be disseminated and that person would not be able to gain legal assistance